

Exhibit A

Scoville

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

In the Matter of:)
) File No. SL-02736-A

THE INVESTIGATION OF)

TRAFFIC MONSOON, INC.)

WITNESS: Charles David Scoville

PAGES: 1 through 190

PLACE: Securities and Exchange Commission
Salt Lake District Office
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101 United States

DATE: Tuesday, May 17, 2016

The above-entitled matter came on for hearing,
pursuant to notice, at 10:05 a.m. MDT.

Diversified Reporting Services, Inc.

(202) 467-9200

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APPEARANCES

On behalf of the Securities and Exchange Commission:

ALISON J. OKINAKA, ESQ.

SCOTT FROST, ACCOUNTANT

CHERYL MORI, ESQ.

Securities and Exchange Commission

Salt Lake Regional Office

351 S. West Temple Street, Suite 6.100

Salt Lake City, Utah 84101

(801) 524-5796

On behalf of the Witness:

CHARLES DAVID SCOVILLE, PRO SE

Also Present:

Samera Hussain

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PROCEEDINGS

MS. OKINAKA: We're on the record at 10:05

on May 17th, 2016.

Mr. Scoville, would you raise your right

hand. Do you swear to tell the truth, the whole

truth, and nothing but the truth?

MR. SCOVILLE: I do.

Whereupon,

CHARLES DAVID SCOVILLE

was called as a witness and, having been first duly

sworn, was examined and testified as follows:

EXAMINATION

BY MS. OKINAKA:

Q Would you state and spell your full name

for the record and any middle name as well.

A Sure. My name is Charles David Scoville.

Charles is spelled C-h-a-r-l-e-s; middle name, David,

D-a-v-i-d; last name, Scoville, S-c-o-v-i-l-l-e.

Q My name is Alison Okinaka, and with me

today are Scott Frost and Cheryl Mori. And we're all

officers of the Commission for the purposes of this

proceeding.

So this is an investigation by the

Securities and Exchange Commission in the matter of

Traffic Monsoon, Inc., File No. SL-2736, to determine

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4 Document with title "Ad Plans" 70

5 Portion of website headed "Terms" 86

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whether there have been violations of the federal

securities laws. However, the facts developed in the

investigation might constitute violations of other

federal or state, civil or criminal laws.

Before we went on the record you were

provided with a copy of the Formal Order of

Investigation in this matter, and it will be

available for your examination during the course of

the proceeding.

Have you had a chance to review the formal

order?

A Yes.

Q Also, prior to going on the record we gave

you a copy of the Commission's Form 1662, and it's

marked as Exhibit No. 1. Have you had a chance to

review Exhibit No. 1?

(SEC Exhibit No. 1 was

marked for identification.)

A Yes.

Q Do you have any questions about that

exhibit?

A No.

Q And are you represented by counsel today?

A No, I'm not.

Q Because you're not represented by counsel,

1 I'm required to highlight a few items from Form 1662
2 for you.

3 You have the right to be accompanied,
4 represented, and advised by counsel. And this means
5 you can have an attorney present and your attorney
6 can advise you before, during, and after your
7 examination today. Do you understand this?

8 A Yes.

9 Q Do you understand that upon your request
10 these proceedings will be adjourned so that you can
11 obtain counsel?

12 A Yes.

13 Q Do you understand that the statutes set
14 forth in Exhibit No. 1 provide criminal penalties for
15 knowingly providing false testimony or knowingly
16 using false documents in connection with the
17 investigation?

18 A Yes.

19 Q And finally, do you understand that you can
20 assert your rights under the Fifth Amendment to the
21 Constitution and refuse to answer any question that
22 might tend to incriminate you?

23 A Yes.

24 MS. OKINAKA: And I should also say for the
25 record that your wife is with us today.

1 And would you give us your name and
2 spelling of your name for the record?

3 MS. HUSSAIN: Samera Hussain. And it's
4 S-a-m-e-r-a. Last name Hussain, H-u-double-s-a-i-n.

5 BY MS. OKINAKA:

6 Q She's just attending and not testifying as
7 a witness today, correct?

8 MS. HUSSAIN: Yeah.

9 BY MS. OKINAKA:

10 Q Correct?

11 A That is correct, yes.

12 Q Just as a -- to start off, we wanted to
13 discuss some of the terms we'll be using today with
14 you to make sure they're the terms you use in
15 connection with Traffic Monsoon, because we have a
16 different background than you do, and so we may be --
17 I know in some of our e-mails we've used terms that
18 you corrected us on.

19 So a person who is buying services from
20 Traffic Monsoon, do you call that a member?

21 A I would say those are advertisers.

22 Q Advertisers, okay. So --

23 A So a member would be anyone who has signed
24 up, whether they have paid for anything or not.

25 Q So it includes free -- what you call free

1 members?

2 A There's free members, yeah.

3 Q Because I know in your materials, you do
4 call them members.

5 A Uh-huh.

6 Q But would advertisers be -- not be the
7 people buying -- participating for free?

8 A Maybe I might have referenced them as
9 either free members, or they've been paid members,
10 like they've purchased something from the website.

11 Q Right. So advertisers are --

12 A -- people who have purchased advertising
13 service.

14 Q And does that include the banner ad
15 packages?

16 A Absolutely.

17 Q Okay. And how about revenue?

18 A Revenue would be generated -- the sale of a
19 service.

20 Q Okay. And do you use the term "profit
21 sharing" or "revenue sharing" for -- I know you speak
22 about each member has an imaginary bucket that fills
23 up from -- I would say revenue that is shared with
24 him. Would that be a term you would use?

25 A On the Ad Plans page, I remember it does

1 say that there's a profit margin that's generated
2 with this advertising sales. So yes, the profits --

3 Q Profit sharing?

4 A We share the profits, yeah.

5 Q So for background, would you give us your
6 address -- your residential address and phone and any
7 e-mail addresses.

8 A Sure. My address is [REDACTED]
9 Boulevard, that's [REDACTED], Murray, Utah [REDACTED] 3.

10 Q And how about your telephone number?

11 A Telephone number is (801) [REDACTED].

12 Q Is that a cell phone?

13 A It is, uh-huh.

14 Q Do you have any other addresses or phone
15 numbers?

16 A No, not really. There is an address in the
17 UK, but no other phone number.

18 Q Is that the address for Traffic Monsoon?

19 A There's another -- that's an address that
20 belongs to a buddy of mine that is registered at that
21 address, but I don't know it by heart.

22 Q Let me ask you if you have any business
23 addresses or phone numbers, then.

24 A There's -- the business address is on the
25 website. I don't know it by heart, though.

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1 **Q That's a UK address?**
 2 A Uh-huh.
 3 **Q Okay. And that phone is your business**
 4 **phone as well?**
 5 A I don't have another -- oh, the phone
 6 number that's on the website is for customer service,
 7 and I don't know that one by heart.
 8 **Q That's okay.**
 9 **So the UK address, you said it was a buddy**
 10 **of yours?**
 11 A Yeah. It's at the Imperial Offices. I
 12 don't remember what the address is, though.
 13 **Q What's his name?**
 14 A His name Aamir Raja. A-a-m-i-r; and Raja
 15 is R-a-j-a, I think.
 16 MS. HUSSAIN: Yeah.
 17 BY MS. OKINAKA:
 18 **Q So we would remind you not to ask your wife**
 19 **for information, because she's not a witness --**
 20 A Sorry.
 21 **Q -- which I know is not easy to do. But**
 22 **that's your recollection of his name, right?**
 23 A Yes.
 24 **Q Okay. And what's your e-mail address?**
 25 A It is [REDACTED].

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1 **Q At your Murray address, do you reside by**
 2 **yourself or with others?**
 3 A With my son.
 4 **Q And what's his name and age?**
 5 A His name is [REDACTED], and he's
 6 10. He'll be turning 11 in June, June 30th.
 7 **Q Is he your only child?**
 8 A He is, yes.
 9 **Q And you're married to Samera?**
 10 A Samera, yeah.
 11 **Q Can you give us your educational background**
 12 **for the record.**
 13 A It's a bit mixed up because I first went to
 14 community college, didn't know what I wanted to do,
 15 so I just took some generals. And then I switched my
 16 major to Spanish and then took Spanish classes. And
 17 then switched my major to -- just trying to
 18 remember -- computers.
 19 **Q Is this still at the community college?**
 20 A And I switched -- I went to a couple
 21 different community colleges. And then I went to
 22 Stevens-Henegar here for computer science. And I
 23 left the degree program because my wife worked there
 24 and we were going through a divorce.
 25 **Q Your former wife?**

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1 A Yeah. And even though I had a 4.0 grade
 2 point average, they were saying, why would you want
 3 to leave; and I just didn't want to go to the same
 4 college that she worked. And I also was looking at
 5 that degree program where it ended and just didn't
 6 want the kind of career that would be at the end of
 7 that road.
 8 And so then I went to LDS Business College
 9 for business entrepreneurship.
 10 **Q Did you graduate from LDS Business College?**
 11 A No.
 12 **Q When did you finish up at LDS Business**
 13 **College?**
 14 A I want to say 2011. Maybe it was 2010.
 15 **Q Why did you leave LDS Business College?**
 16 A Well, it's an entrepreneurship program that
 17 they have there, and part of the program they have is
 18 a launch and learn. And so you launch a business,
 19 and you learn from it. And since I was already
 20 successfully running a home business, I decided to
 21 focus more on the entrepreneurship, actually running
 22 the business than going to school to learn more about
 23 how to do it, since I was already doing it.
 24 **Q And can you summarize your work history for**
 25 **us?**

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1 A Sure. I started out when I was I guess 15.
 2 I worked at A&W. And then I worked at Wendy's and a
 3 gas station, a Texaco. I worked in a call center
 4 doing customer service. And then after working with
 5 them for almost a year, I served a mission for the
 6 LDS Church for two years in Arizona. And then after
 7 that I worked in more customer service positions for
 8 about the next ten years.
 9 **Q Was that in Salt Lake?**
 10 A Both in Colorado, also in Illinois, and
 11 also in Salt Lake and West Valley. SelectHealth is
 12 out there. I was out there for about two years.
 13 **Q So you were in customer service for about**
 14 **ten years?**
 15 A Uh-huh.
 16 **Q When did you -- when did that end? What**
 17 **year?**
 18 A It was about the same year I was in --
 19 right before I went to LDS College, so 2010.
 20 **Q And you mentioned you had -- you were**
 21 **running home-based businesses at some point.**
 22 A Yeah.
 23 **Q When did you start doing that?**
 24 A I started March of 2010.
 25 **Q What business was that?**

1 A It was a business called TviPtc, and it was
2 a pay-to-click website.

3 **Q What was it? Tvi --**

4 A TviPtc.

5 **Q Is that business still active?**

6 A It's not.

7 **Q And did you do any home-based businesses
8 after that?**

9 A Yes. While I was running this business, I
10 also went to LDS Business College. And, like I
11 mentioned, we had that launch and learn class. So
12 part of the class it was required for us as a group
13 to start a business, register it, and we had to
14 generate at least \$3,000 in revenue throughout the
15 course of the semester. And if we didn't reach that
16 level of sales, then we didn't pass the class. So we
17 had to get to work, and we formed a business. We
18 released the business. And luckily, we were able to
19 generate the sales before the semester ended.

20 **Q So each student had to do that?**

21 A Yeah, each group. It was a group project.

22 **Q Okay. So when you say "we," you mean the
23 group?**

24 A Yeah, the group. Yeah.

25 **Q What was that business?**

1 A It was U Launch Formula.

2 **Q What kind of business was it?**

3 A What we sold was advertising, but also
4 training and a list of advertising resources that
5 people could use to advertise whatever their business
6 is online. So not only were we offering an
7 advertising service, but we also had training and
8 also an auto responder service where when people made
9 that purchase, then they had this form that they
10 could send to people via e-mail or whatever to sign
11 up, and then they could save their information.

12 I don't know if you're familiar with Lead
13 Capture, but that's what it was --

14 **Q No.**

15 A -- is a service, like AWeber is another
16 related service. And so we were charging just \$10 a
17 month instead of AWeber, what they charge is \$19 or
18 more per month depending on your list size, however
19 many people you have signed up. We had unlimited
20 list size, so no one had any limits, and it was just
21 \$10 per month.

22 **Q Any home-based businesses after that before
23 Traffic Monsoon started?**

24 A Yes. There were a few different ideas that
25 I was testing out there in the marketplace. I don't

1 remember the list of them all by heart right now, but
2 I have them on a website online that kind of goes
3 through what each of them was.

4 **Q Where is that?**

5 A It's CharlesScoville-TrafficMonsoon.com, I
6 think.

7 **Q It's on there?**

8 A I think so.

9 **Q Okay. I have that link.**

10 A Okay. So it goes through each of the
11 different businesses, and it explains what it was
12 that people were buying. And with each business, the
13 struggle that I experienced was traction in the
14 marketplace. Some of these only had a couple hundred
15 customers that, after using the services for a month
16 or two, they decided not to use it anymore.

17 So then after a number of months went by,
18 no one was using the services. I was like, oh, what
19 a bummer; I'm going to have to go back to the drawing
20 board, try to figure out how to perfect my services,
21 how to make things better for the customers so people
22 could actually use the services long term. Because I
23 wanted to create a business that I could actually run
24 for years and years and years and years to come.

25 **Q I have a list of the ones I'm aware of --**

1 A Okay.

2 **Q -- with me. So I could ask you about them
3 now.**

4 A Sure.

5 **Q I'll do that, but I'll finish up my
6 background first.**

7 **What's your date and place of birth?**

8 A Date, January 4th, 1980. And I was born in
9 Boulder, Colorado.

10 **Q Do you have any professional licenses? For
11 example, a CPA license, a real estate license,
12 anything like that?**

13 A No license other than just a business
14 license, yeah.

15 **Q Right. And where do you have bank
16 accounts?**

17 A My bank is Chase Bank.

18 **Q Is that in Park City?**

19 A Well, I guess it's -- I opened it here in
20 Salt Lake, but they opened it up in Park City. I
21 don't know why they did that.

22 **Q Any other bank accounts --**

23 A No.

24 **Q -- currently? Do you have any --**

25 A Just with Chase.

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1 **Q Oh, sorry. Do you have any bank accounts**
 2 **overseas in other countries?**
 3 A There is a bank account in Dubai, but
 4 there's nothing in it.
 5 **Q Is that in your name?**
 6 A It's actually in Traffic Monsoon's name.
 7 **Q What bank is it?**
 8 A I think it's NBD.
 9 **Q NBD?**
 10 A NBD.
 11 **Q When did you open that account?**
 12 A I think it was either January or February
 13 of this year.
 14 **Q Are you the signatory on the account?**
 15 A Yes.
 16 **Q Is anybody else a signatory?**
 17 A I don't think so.
 18 **Q What was the purpose of doing that?**
 19 A The purpose of opening that bank account
 20 was people in that region of the world were reporting
 21 that making purchases through different payment
 22 processors were really difficult. And they also
 23 reported that sometimes trying to send a wire
 24 transfer to the United States to make a purchase of
 25 service, it wasn't going through. So they had

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1 requested to have a bank opened in that region of the
 2 world to make it easier for them to make purchases.
 3 **Q And you say there's nothing in it now?**
 4 A Nothing. I decided not to because some
 5 people had warned me that since it's in Dubai, the
 6 bank might have -- like my sponsor might have the
 7 ability to gain access to those funds. And since
 8 someone gave me that warning, I just said, okay, I'm
 9 not going to put anything in there.
 10 **Q Why do you have a sponsor? How does that**
 11 **work?**
 12 A Well, if you're going to register a
 13 business, you have to be a resident or have a
 14 resident visa. So I had to get a resident visa, and
 15 in order to do that you have to have a sponsor.
 16 **Q And do you have any brokerage accounts?**
 17 A No.
 18 **Q Does Traffic Monsoon have bank accounts?**
 19 A Traffic Monsoon does, uh-huh.
 20 **Q And where are they? What institute?**
 21 A Just the Traffic Monsoon bank account is in
 22 Chase Bank.
 23 **Q So you also have a personal bank account at**
 24 **Chase?**
 25 A Yes.

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1 **Q Okay. And the Dubai account for Traffic**
 2 **Monsoon?**
 3 A That's right, but there's nothing in it.
 4 **Q Does Traffic Monsoon have a brokerage**
 5 **account?**
 6 A No.
 7 **Q Let me ask you about my list of prior**
 8 **entities.**
 9 A Uh-huh.
 10 **Q And I have AdHitProfits.**
 11 A Yeah.
 12 **Q Are you the -- were you the owner of**
 13 **AdHitProfits?**
 14 A Yes. And it's still there online.
 15 **Q Anybody else own that business?**
 16 A No. Just me.
 17 **Q And can you describe what the business was?**
 18 A It's very similar to Traffic Monsoon. The
 19 problem that we bumped into, like what I mentioned
 20 before about customer retention and traction, is
 21 after about three months customers kind of walked
 22 away. So it also did the revenue sharing or profit
 23 sharing. And when the revenue sharing slowed down
 24 for people, there was less revenue to share. People
 25 were screaming scam and fraud and things like that.

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1 And the Utah state securities division
 2 actually investigated, and they went through the
 3 entire thing and found, okay, yeah, he's not offering
 4 any kind of security here with this. So they passed
 5 it over to the consumer protection department, and
 6 they looked through to see if maybe I had been
 7 misrepresenting what I was offering, and they closed
 8 their file as well.
 9 **Q When you were mentioning that the revenue**
 10 **dried up, what was -- where was the revenue coming**
 11 **from for AdHitProfits?**
 12 A Through advertising sales. So people
 13 essentially decided not to use my services. There
 14 were still many people who were, but the bulk of the
 15 customers, they were walking away to use different
 16 services.
 17 **Q Did the revenue include money people had**
 18 **paid in to buy the services, then?**
 19 A So the money that we were sharing were
 20 people buying services, right.
 21 **Q So AdHitProfits is still online, but is it**
 22 **active?**
 23 A Yeah, it is. It still pays.
 24 **Q How many members did it have at its peak,**
 25 **more or less?**

1 A I think -- you know, it's been a while
2 since I've looked at those numbers, but it's around
3 40,000.

4 **Q Do you have a sense of the total amount of**
5 **money that members put into AdHitProfits?**

6 A I would have to look it up. I don't know.

7 **Q I'm wondering why --**

8 A And just to reword it is people don't put
9 money in, because that would denote that it's an
10 investment. And people have the clear description on
11 the website that it is a purchase of service, just
12 like you don't put money into Smith's store when you
13 buy groceries or buy a gallon of milk.

14 **Q Sure.**

15 A You're not putting money into your gallon
16 of milk, but you are buying a gallon of milk and
17 receiving the milk. And that's what AdHitProfits is
18 as well, is people aren't putting money in, because
19 it's not a deposit. It's nothing like that. It's a
20 purchase of service.

21 **Q Okay. It's the money they put in to buy**
22 **whatever service it offers?**

23 A Right. But they're not putting money in --

24 **Q Oh. I keep saying --**

25 A Yeah.

1 **Q Why do you think Traffic Monsoon has been**
2 **so much more successful than AdHitProfits?**

3 A I think it's because the quality of the
4 services are a lot more. They're a lot better. And,
5 you know, I put those same kind of improvements into
6 AdHitProfits; but when you have customers who have
7 walked away, it's hard to get them to come back. And
8 so starting -- you know, releasing another business,
9 it's something new, it's fresh, and people are
10 attracted to new things. So I think it's because of
11 the services really have better quality to them. A
12 lot more effort has been put into it.

13 **Q What services did it offer?**

14 A AdHitProfits?

15 **Q Right.**

16 A Banner services, a directory listing, text
17 ads, traffic to the traffic exchange. It had --
18 still has, I guess, something called massive traffic,
19 which also displays ads on many different websites.
20 So a number of services.

21 **Q So very similar to what Traffic Monsoon**
22 **offers?**

23 A Yeah, absolutely.

24 MR. FROST: Is AdHitProfits considered a
25 competitor to Traffic Monsoon?

1 THE WITNESS: No, I wouldn't say so. There
2 are some people who look at different traffic
3 exchanges as being in competition, but what I
4 generally tell people is that each traffic exchange
5 generally has a lot of the same customers using them.
6 Because people who really understand advertising,
7 they advertise using many different advertising
8 resources. So instead of looking at it as
9 competition, we're all coexisting in the same
10 industry.

11 MR. FROST: Would you advise someone to buy
12 services through AdHitProfits or Traffic Monsoon, or
13 both?

14 THE WITNESS: Both, I guess. I would
15 advise people to use NeoBux as well or Clixsense,
16 EasyHits4U, ilovehits. There's many different
17 websites that I've recommended people to use.

18 BY MS. OKINAKA:

19 **Q And then I have another -- I came across**
20 **another entity called InfinityBux.com. Was that an**
21 **entity you formed?**

22 A It is. It is. TviPtc was the first
23 pay-to-click website that I released. And after a
24 number of months, I think it was in July of that same
25 year, people were saying, wow, Charles, we love what

1 you've made here; can you make us another? I was
2 like, sure, not a problem.

3 And at that same time I was going to LDS
4 Business College, and I was speaking with my
5 professor. He said, Charles, multiples, absolutely.
6 You should set up like six of these.

7 So I was like, hey, you know what, that's
8 good. Because I was making kind of barely enough
9 income to survive on with just one site. But if I
10 had multiple sites, then I could make a better
11 income.

12 **Q Was InfinityBux a pay-to-click website?**

13 A Yeah, uh-huh.

14 **Q That's a yes?**

15 A Yes, that's right.

16 **Q What's its status?**

17 A It's also closed.

18 **Q So it's not active anymore?**

19 A No.

20 **Q How about BuxSecure?**

21 A Same thing.

22 **Q Is that yours?**

23 A Yup.

24 **Q Same type of business?**

25 A Exact same, uh-huh.

1 **Q Is it active?**
2 A No.
3 **Q You talked about TviPtc. How about**
4 **PowerfulBux?**
5 A Same thing. Same exact business model,
6 exact everything. There were six, actually. There
7 were six pay-to-click websites. There was TviPtc,
8 InfinityBux, BuxSecure, PowerfulBux, ForeverBux --
9 **Q I didn't have that one.**
10 A -- and I can't remember the last one right
11 now.
12 **Q I have BuxUnleashed.**
13 A BuxUnleashed. That's the last one.
14 MR. FROST: And every one of these where
15 you say "bux," it's b-u-x?
16 THE WITNESS: Right. It's a common term
17 that -- within the pay-to-click website industry,
18 many of them end in bux, like NeoBux.
19 BY MS. OKINAKA:
20 **Q How about Banrev.com?**
21 A Yeah, that's mine.
22 **Q That's yours. And same kind of business,**
23 **or different?**
24 A Similar. Similar. It was me just trying
25 out another business model, seeing how that worked in

1 the marketplace. It was also selling advertising
2 service.
3 **Q Is it active?**
4 A It's not.
5 **Q How about Ultimate Power Boost?**
6 A That as well, yeah. But again, with the
7 traction in the industry, it just didn't gain the
8 traction.
9 **Q Same type of business?**
10 A Similar, but not -- it was -- it wasn't
11 like a revenue sharing; it was commissions only.
12 **Q Okay. Is it active?**
13 A No.
14 **Q WealthEngineX.com?**
15 A That, again, was a commission base, but the
16 traction just wasn't there.
17 **Q And we talked about U Launch Formula.**
18 A Yes.
19 **Q Any others that we haven't talked about?**
20 A I can't recall any others at this time, but
21 I have them all listed on that website.
22 **Q Oh, right.**
23 **I just had a few housekeeping matters for**
24 **you. You came in and spoke to us earlier on April**
25 **25th, correct?**

1 A Yes, that's right.
2 **Q Voluntarily?**
3 A Uh-huh.
4 **Q And we tape recorded our conversation.**
5 A Yes.
6 **Q And so we may be asking you some of the**
7 **same questions today just to be thorough --**
8 A Sure.
9 **Q -- just to let you know that.**
10 A Not a problem. If I could, could I explain
11 what happened with the pay-to-click websites?
12 **Q Oh, yes, definitely.**
13 A Okay. With those websites everything was
14 going great until about May of 2011, so just after
15 our year mark. And what happened was someone or a
16 number of people chose to create multiple fraudulent
17 transactions through PayPal. And because of the
18 large volume of fraud that came through, it increased
19 our chargeback rating to being more than 1 percent,
20 and so we lost PayPal. So they held the funds for
21 180 days, which made it difficult to pay people.
22 **Q Is this the six sites that were all running**
23 **at the same time?**
24 A Yeah. They all used the same PayPal and
25 the same Payza account. And what happened after that

1 was we kept up with just maintaining the business
2 through Payza, but then Payza lost their credit card
3 processing in October, so sales were stopped.
4 So while we were waiting on those funds to
5 be released from PayPal, it was just going to take
6 way -- we just didn't have the money to pay people.
7 So people were complaining that I had scammed them.
8 They were, you know, circulating things that I had
9 done something wrong, but the truth was I hadn't done
10 anything wrong. It was just PayPal was holding onto
11 the funds, and I just couldn't pay people what they
12 had earned.
13 And then by the time that PayPal released
14 the funds, we got all of the money over into Payza
15 and everyone got paid instantly. And everything was
16 working great for another year and a half until
17 November of 2013, Payza was the only payment
18 processor that I was using; and what happened with
19 that is their funds that Payza was holding onto
20 inside of the United States was actually being stored
21 in a payment processor or money transmitter called
22 OvalPay. And OvalPay, they had their funds seized by
23 the Department of Justice.
24 And so what the Department of Justice did
25 is they took all that money from OvalPay, which meant

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1 my balance inside of Payza was no longer backed up by
2 any money, because the government had taken that from
3 OvalPay. And so all of this you can Google search.
4 You can probably check in with the Department of
5 Justice that it's still unresolved.

6 So what basically had happened with those
7 pay-to-click websites, all of the money that belonged
8 to the members was actually now held by the
9 Department of Justice, because it was OvalPay. They
10 had lost their money transmitter licenses, and so
11 they had all of the money seized that was being held
12 which actually belonged to Payza, and Payza was
13 holding the money that belonged to my members.

14 **Q Oh.**

15 A So after displaying all of the news of what
16 had happened on those websites to all of the members,
17 for more than six months -- I don't remember exactly
18 how long, but I know it was probably close to a
19 year -- then it became time for me to either pay for
20 the renewal of the hosting and the domains and
21 everything on the sites or just close it down. And
22 since no one was logging in anymore, no one was using
23 the sites whatsoever, I said, you know what, why am I
24 paying to keep the sites up? So I just closed the
25 sites down.

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1 **Q Do you know what the Department of Justice**
2 **action was about?**

3 A It was I believe something to do with the
4 money transmitter licenses with OvalPay. I have no
5 idea what else. A lot of conflicting, confusing
6 information. But I've spoken with the owner of Payza
7 about it, and it seems to be something just -- some
8 kind of tricky something to do with the license
9 requirements, and they lost their transmitter
10 licenses.

11 **Q So for the record I should ask you, is**
12 **Payza a payment processor?**

13 A Yes. Payza is similar to PayPal.

14 **Q And SolidTrustPay is also a payment**
15 **processor?**

16 A Yup, that's correct.

17 **Q So you're still using Payza. Are you**
18 **worried about something like this happening again?**

19 A I was at first, but I have a very good
20 relationship with them, and they've explained to me
21 all that has happened and all what they have done to
22 protect themselves from ever having that happen
23 again. So I feel very confident using Payza.

24 MR. FROST: When did you start
25 AdHitProfits?

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1 THE WITNESS: AdHitProfits, I want to say
2 it was like April 6th or something like that, of
3 2013.

4 MR. FROST: About the time you were having
5 difficulties with the other websites, you --

6 THE WITNESS: No. The difficulties didn't
7 happen until November.

8 MR. FROST: But you didn't shut down
9 AdHitProfits?

10 THE WITNESS: Huh-uh.

11 BY MS. OKINAKA:

12 **Q That's a no, right?**

13 A Right, no.

14 **Q And then as a housekeeping matter, I wanted**
15 **to talk about the large database you produced to us,**
16 **just to have it on the record.**

17 A Okay.

18 **Q So we asked you -- you produced a database**
19 **to us that I think is every transaction since Traffic**
20 **Monsoon was formed. Is that right?**

21 A No. There's two databases that I sent. The
22 large one is every account balance in or out, any
23 kind of increase or decrease on an account balance
24 since the start. So it's not every purchase. But
25 the purchase -- I sent you a separate database table

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1 of pay-ins that shows the purchases.

2 **Q Was that your very recent e-mail?**

3 A No.

4 **Q Oh. That was the first database you sent?**

5 A Because there was a couple of different
6 databases with that e-mail that I sent.

7 **Q So maybe I'm confused. I thought the first**
8 **database you had your programmer send us was the --**
9 **only a portion came through.**

10 A There were more than one file including
11 that attachment. The one is the total balances, and
12 then the other one is the purchases. And I don't
13 know if that purchase is the one that was complete,
14 but I believe it is.

15 **Q Can you describe the steps you took to**
16 **assemble that information and have it sent to us?**

17 A Well, the first one, that was incomplete, I
18 logged into my database in the SQL, and there's an
19 option there to download or export the whole table.
20 And it was downloading and downloading and
21 downloading, and it said it was complete. And then I
22 realized, I think after sending it to you, that it
23 wasn't fully complete, because we were talking about
24 how many rows were in there. I was like, actually,
25 it should be a lot more than that.

1 So I actually got a hold of my hosting
2 company and asked them if they could please help pull
3 that record for me. And then they pulled it, and
4 then they uploaded it for me to my own server. And
5 then I downloaded it and then sent it over to the
6 file sharing thing for you.

7 **Q Was that Snoork --**

8 A Yes, Snoork.

9 **Q -- your web host?**

10 A Uh-huh.

11 **Q I had thought you used your programmer in**
12 **Russia to do that.**

13 A No, not that time.

14 MR. FROST: When you say you downloaded it
15 to your own server, what is that?

16 THE WITNESS: Well, my hosting company,
17 their method of sending it to me was they pulled it
18 from their side and then put it on my server for me
19 to be able to download.

20 MR. FROST: When you say your server, you
21 mean -- do you have a standalone computer server
22 somewhere, or is it still your host?

23 THE WITNESS: The hosting company, what
24 they offer is hosting. So that's like file space.
25 But what I have are dedicated servers that no one

1 situation. I'm running low. And unfortunately,
2 there was a payment processor I was using with
3 AdHitProfits called EZY Bonds, and they had stolen
4 about a half a million dollars from the company.

5 **Q What are they called, again?**

6 A EZY Bonds. E-Z-Y, and then Bonds,
7 B-o-n-d-s.

8 **Q And they stole money --**

9 A About half a million dollars from the
10 company. They had people wiring the money, and then
11 with that money they would be able to use that money
12 to make purchases on AdHitProfits. And then when
13 people would earn commissions or whatever, people
14 would make those requests through EZY Bonds to get
15 those commissions, but no one was getting paid. And
16 then when I asked for the money that they were
17 holding for my company to be sent to me, they
18 wouldn't send it, so they stole it.

19 **Q How did you address that?**

20 A I reported it to every known organization,
21 including the SEC. I reported it to pretty much
22 everywhere --

23 **Q Did you file a lawsuit -- sorry.**

24 A -- including the ASIC. And I retained an
25 attorney in Australia, and it would have just cost

1 else is sharing, just me. And so they put it onto
2 one of my dedicated servers.

3 BY MS. OKINAKA:

4 **Q Those are servers at Snoork?**

5 A Uh-huh.

6 **Q Yes?**

7 A That's right, yes.

8 **Q Okay. So let's talk about Traffic Monsoon.**
9 **When was that formed?**

10 A It was formed October 10th of 2014.

11 **Q And are you the owner?**

12 A Yes.

13 **Q Does anyone else own any of it?**

14 A No.

15 **Q Why did you form Traffic Monsoon?**

16 A Well, a few different reasons. One reason
17 was with AdHitProfits the sales had been dropping,
18 and I was to a point in my financial position where I
19 was working trying to promote it, trying to build the
20 business, trying to generate more customers, and my
21 income was dropping.

22 I also had customer service representatives
23 that I couldn't afford anymore, so I had to let them
24 go. And they needed work, so I said, you know what,
25 I recognize that you guys are in a financial

1 too much money. I didn't have that kind of money to
2 spend on that kind of a lawsuit, so I had to just let
3 it go.

4 **Q So you were talking about how you came to**
5 **form Traffic Monsoon.**

6 A So I was kind of basically in a position
7 where the income that I had been saving for my own
8 self, I made sure to keep that to back up the
9 members' earnings that had earned within AdHitProfits
10 so that they wouldn't suffer from what EZY Bonds did
11 to the company. And then I was basically in a
12 position where I was like, well, either I spend
13 someone else's money for my own living expenses or
14 I'm going to have to do something. So that's
15 basically what Traffic Monsoon was.

16 So there's been a number of people as well
17 requesting me to please release something new. So I
18 said, okay, that's what I'm going to do.

19 So throughout the whole AdHitProfits time
20 frame, ever since it was launched, I was noticing
21 things that I could improve, and I was improving
22 those things, but some of those improvements weren't
23 noticed by the members or by the customers. And so I
24 pretty much had formulated a much better business
25 plan that -- then I said, you know what, we can go

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1 ahead and release that, then, here with Traffic
2 Monsoon.

3 **Q What were some of the things that you felt**
4 **you wanted to improve from AdHitProfits?**

5 A One of those things is using outside
6 advertising resources to help deliver the traffic
7 through the traffic exchange and speed up the
8 traffic. And also, not only through the traffic
9 exchange but through the massive traffic.

10 Also, what I really wanted to do was focus
11 first on getting people into the traffic exchange
12 industry who were already involved in the industry.
13 With AdHitProfits there were people that got involved
14 at first that had no idea what a traffic exchange
15 was.

16 So with Traffic Monsoon, my primary focus
17 was making those connections with leaders and
18 business owners within the traffic exchange
19 industry -- list owners, other owners of different
20 traffic exchanges -- communicate with them, and then
21 use their services and see if I could get some kind
22 of discounts on their services.

23 **Q Does Traffic Monsoon have any employees?**

24 A Technically no employees, just freelancers
25 that are getting paid for providing service.

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1 **Q What freelancers do you have? Like, what**
2 **roles do they have?**

3 A Just answering support tickets and
4 reviewing advertisements, making sure there's nothing
5 pornographic or gambling sites, those types of
6 things. We want to keep that kind of stuff off the
7 site.

8 **Q Does that include the people in your call**
9 **centers?**

10 A So the call centers are -- I have a friend,
11 Ernie Ganz; he owns call centers both in Florida and
12 also in Philippines. So he's a friend of mine. And
13 he said, I can give you these services. He gives me a
14 price. He says, Charles, you're the only client that
15 I have that I don't have a contract with, because I
16 just trust you; I believe in you; I know you. And so
17 I pay him a monthly fee, and he provides the services
18 through his call centers.

19 **Q Didn't you have a third call center that**
20 **you mentioned?**

21 A There is. There is in North Carolina. Dave
22 Barker, he's also got a call center that he has set
23 up. And I pay him the same, a monthly fee. It's a
24 different fee than Ernie's because he has a different
25 number of staff that are there.

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1 **Q Where does Traffic Monsoon have offices?**

2 A Technically we don't have any offices, just
3 my home address.

4 **Q And then the UK we already talked about?**

5 A Yeah. And that's not really an office
6 where anyone can really go. It's just -- with Allied
7 Wallet they required me to have a registration in the
8 UK, and so -- I guess there are now people there
9 because their office was having people come in with
10 inquiries. So with Aamir Raja, I pay him 6,000
11 pounds a month to pay the people that are manning the
12 center there.

13 **Q Can you explain what Allied Wallet is, for**
14 **the record?**

15 A Allied Wallet is a credit card processor.

16 **Q How did you capitalize Traffic Monsoon? Or**
17 **did you?**

18 A What do you mean by "capitalize"?

19 **Q All the money that you had to start it,**
20 **where did that come from? Or did you need any money?**

21 A I didn't really need any money because it
22 really wasn't very expensive. I started with a
23 single server. It was a couple hundred dollars. And
24 I have a really good relationship with my programmer,
25 and so he gave me a good price on his work. And a

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1 lot of it was just a copy of AdHitProfits anyway.

2 So all of the programming work has been
3 done other than just some improvements that I wanted
4 to have him make. And so we built that up. It took
5 a couple of months for him to do the work, and then
6 we got it going.

7 **Q Your programmer is in Russia, right?**

8 A Yes, he is.

9 MR. FROST: What's his name?

10 THE WITNESS: His name is Alex Klilsh. I
11 can't remember how to spell his last name.

12 MR. FROST: And you were mentioning the
13 call centers. They answer questions from Traffic
14 Monsoon customers?

15 THE WITNESS: That's right.

16 MR. FROST: How are they trained?

17 THE WITNESS: They're trained -- first, I
18 train Ernie or I train Dave, and then he trains them
19 on how to respond to inquiries.

20 MR. FROST: Okay. Do they have -- did you
21 produce some kind of a script or some kind of a
22 booklet they can use?

23 THE WITNESS: There were templates that
24 were created for some of the common issues. And
25 through time, issues shift and they change, they

1 develop into new ones. So they kind of created their
2 own templates and scripts to handle various different
3 issues, making it easier just to copy and paste and
4 get through tickets a little bit faster.

5 BY MS. OKINAKA:

6 **Q So if somebody wants to find out about**
7 **Traffic Monsoon or purchase services, what is his**
8 **source of information?**

9 A Probably the best source is the website
10 itself or video. Because I know there's a number of
11 people out there that don't really understand the
12 business and explain it sometimes a little bit
13 differently than what is actually on the website.

14 So I always recommend people to read
15 through the website, watch the videos. When people
16 sign up, there's actually a getting started link
17 inside the member area. But when you click on that,
18 it steps through how to get started, what Traffic
19 Monsoon is, how everything works.

20 **Q And when you said "video streaming," videos**
21 **that you have made?**

22 A Yes, on YouTube. Yes, the ones I have
23 made.

24 **Q Okay. Were there -- did you produce any**
25 **like promotional materials, written materials, sales**

1 **materials that talk about Traffic Monsoon?**

2 A No, I haven't. No, I haven't. There's
3 just been some banners that have been made and the
4 landing pages that people can see when they log in.
5 There's the links on their main dashboard to the
6 landing page that just kind of goes over what people
7 are able to purchase on Traffic Monsoon, how they can
8 benefit. It's a traffic exchange. Talks about the
9 surf ratios, meaning you click through a certain
10 number of ads, and then you earn a certain amount of
11 credits that you can then use to promote your own
12 website.

13 So that's -- those landing pages and
14 banners are all that I've actually ever created.

15 **Q And you see those if you're a member; is**
16 **that right?**

17 A Or even if you're not, because they can use
18 those links on different websites to display the
19 advertisement or the banner.

20 **Q Have we seen those? I don't know if we**
21 **have -- if we can look at those. Or can the public**
22 **just view them?**

23 A Yeah. The public can, sure. I can give
24 you links to them, for sure.

25 **Q Are they links from the Traffic Monsoon**

1 **website?**

2 A They are on the Traffic Monsoon website,
3 yes.

4 **Q And what are they called?**

5 A Landing pages --

6 **Q Okay.**

7 A -- and also banners.

8 **Q That's what they show up as on the website?**

9 A Yes.

10 **Q Okay. Then we can find them.**

11 A Sure.

12 **Q So you talked a little bit about how you**
13 **get advertisers and members, how you started off by**
14 **contacting people who were involved in other traffic**
15 **exchanges. Is that right?**

16 A That's right.

17 **Q And how -- from there, how did you get the**
18 **members that you have and advertisers? Were there**
19 **other ways?**

20 A Absolutely. Absolutely. Pretty much the
21 best way to grow a business is through massive
22 advertising. So not just talking with leaders, not
23 just talking with people, but I went to every single
24 traffic exchange I knew of, and I advertised Traffic
25 Monsoon there. And I went to every pay-to-click

1 website that I knew of and advertised there as well,
2 just to help get the name out there. And I kept
3 those campaigns running constantly so people that are
4 involved in the industry, they see my brand basically
5 everywhere.

6 And then as more and more people start
7 using the services, then people would get out there
8 and start talking about the services with other
9 people, and that helps bring in more customers as
10 well because now you've got customer experience. They
11 can talk about, hey, this is actually good service.
12 They're like, oh, really? Let me try it.

13 So you've got more people actually using
14 the services, but I just try to stay out there as a
15 constant where people are seeing me everywhere.

16 **Q Do you -- I guess other than that online**
17 **presence, do you recruit people personally one on**
18 **one?**

19 A Well, I wouldn't say "recruit" --

20 **Q Yeah. No, I --**

21 A -- but I've never really -- I'm kind of a
22 shy person, so I don't really talk to people about --
23 I usually use the website to do the selling and just
24 send people to the website. I don't really have the
25 one-on-one other than just with some of the people

1 that I knew inside the industry. Said, hey, I'm
2 releasing a traffic exchange; I'd love for you to
3 check it out and let me know what you think.

4 **Q Are there in-person conferences in this**
5 **industry that you can attend to talk about --**

6 A There are some people that are involved in
7 Traffic Monsoon who have decided to grow their
8 business by holding events or conferences. But those
9 aren't Traffic Monsoon, so to speak. Like, I'll go
10 and attend them to show my support, but they're not
11 put on by the company.

12 **Q Is this similar to what you were telling us**
13 **when you came in earlier about events in other**
14 **countries that you've attended?**

15 A Right. That's correct. Like, in Poland
16 there is a man there named Peter. He's been growing
17 his business. And he said, Charles, we would love to
18 have you out here so people can meet you. So I went
19 out there just to show my support of him, because his
20 efforts have been growing the business, and I wanted
21 people just to see who I am.

22 **Q Did the attendees at events like that**
23 **include people who are not yet members of Traffic**
24 **Monsoon?**

25 A I'm sure some of them are not yet members,

1 absolutely.

2 **Q And do you talk about what Traffic Monsoon**
3 **is and so forth at those?**

4 A I do. I do. And sometimes I see some of
5 the descriptions of what people are saying is
6 inaccurate. So when I get up I clarify, this is how
7 this actually works, so just make sure to bear that
8 in mind. This is that; this is the other thing.

9 So I know that there are people out there
10 that are misrepresenting some of the things that are
11 being clearly outlined on the website. But whenever
12 I'm present or whenever I know of those things, I
13 make sure people are made fully aware that they need
14 to be explaining it correctly.

15 **Q Have you been to events like that in the**
16 **U.S.?**

17 A Just, actually, the first time a couple
18 days ago in New York.

19 MR. FROST: What kind of an event was that?

20 THE WITNESS: It was -- I don't know
21 exactly how to describe it. It was a business
22 meeting. Most of the people there -- in fact, I'm
23 pretty sure 100 percent of the people there were
24 already a member, already involved in using the
25 services. So I think a number of people there just

1 wanted to have a chance to meet me and just have that
2 social aspect of being all involved in something
3 together and just kind of talk about things and ask
4 questions, especially since there's PayPal holding
5 onto funds.

6 People want to ask, what's going on; what's
7 happening; what's your plan moving forward. Or, we're
8 using Payza; here are some issues we want you to know
9 about so as you're working with Payza, you can let
10 them know of those issues. And then just people
11 asking general questions: Do you have plans of
12 releasing more services? Or whatever.

13 So it was just kind of an open question and
14 answer, helping people get to know us as well as
15 having a meal together.

16 MR. FROST: So how was it set up?

17 THE WITNESS: One of the members that's
18 involved, his name is Ian Bigg. He set up the event.
19 He organized everything. He set up the hotel. He
20 booked everything up and then invited people to come.
21 And then the people that were already involved, they
22 came. And he said, hey, everyone, Charles is coming.
23 First, he asked me, can you come to this? And I was
24 like, yeah, I'll come for that. I'll come and see
25 you guys.

1 BY MS. OKINAKA:

2 **Q Where was it?**

3 A It was in -- I guess technically in New
4 Jersey. It was at a hotel, the Sheraton Hotel in New
5 Jersey. I'm trying to remember more details other
6 than that.

7 **Q What town, city?**

8 A Can't remember. It was like "Weegee"
9 something. I don't remember. It was weird. I can't
10 after --

11 **Q Was it Weehawken?**

12 MR. FROST: Weehawken.

13 THE WITNESS: Weehawken, yes.

14 MR. FROST: It's right on the river.

15 THE WITNESS: Yes. Beautiful view of the
16 city.

17 BY MS. OKINAKA:

18 **Q Almost a better place to be to see New**
19 **York.**

20 A You can see the Skyline. Yeah, it's
21 beautiful.

22 (SEC Exhibit No. 2 was
23 marked for identification.)

24 **Q Okay, we're showing you what's been marked**
25 **as Exhibit No. 2.**

1 A Okay.

2 **Q Do you recognize that?**

3 A Yes, I do recognize it.

4 **Q What is it?**

5 A It's the front page of my website.

6 **Q We printed this on April 25th, 2016. Do**
7 **you know if it's changed since that date?**

8 A Definitely the number of visits delivered
9 has changed.

10 **Q Sure.**

11 A Definitely a lot more.

12 **Q Do you have a sense what the number of**
13 **visits is currently?**

14 A I know it's over 1.45 billion. I don't --
15 I could pull it up on my phone now if you want me to.

16 **Q No, that's okay.**

17 **On the first page here it talks about Alexa**
18 **Rank.**

19 A Uh-huh.

20 **Q Can you explain what that is?**

21 A Alexa Rank. Alexa is an Amazon-owned
22 company which gauges popularity of the websites that
23 are out there based upon how much visitors they're
24 receiving and how much traffic and how long their
25 visitors are on their website. And so the Alexa

1 the United States there are some people who are
2 signing up who are actually not real people.

3 **Q I don't know if I noticed that.**

4 A You probably -- if you look through that
5 record, there's many e-mails that are similar or
6 names that are similar, information that's similar
7 because people are attempting to cheat, clicking
8 through the traffic exchange or advertising to their
9 websites. And they might use bot clickers to click
10 through and earn those credits, or they might click
11 on those cash links and earn money for free using
12 robots. And so we've been working very hard to
13 eliminate the fake traffic from the website.

14 Plus, with Traffic Monsoon we lost PayPal,
15 and so with that you lose a certain amount of your
16 customer base just with that alone, because a lot of
17 people, they prefer using PayPal compared with any
18 other payment processor on the Internet. So that
19 would definitely be one of the reasons why you're
20 seeing a drop in traffic to the website.

21 **Q Although if they're using the bot clickers,**
22 **you'd think that would increase the traffic, wouldn't**
23 **it?**

24 A It would. But we're getting really good at
25 stopping that kind of traffic.

1 Rank, what you're seeing there is out of all of the
2 websites, the many millions of websites that exist in
3 the world, we're ranking above the 2,500 mark, which
4 is amazing, because probably within Salt Lake City
5 alone there's probably more than 2,500 people who
6 have websites. So out of all of the world having
7 that much rank of traffic means there's a lot of
8 visitors coming to the website.

9 **Q And we talked about this when you came in**
10 **earlier, but I just wanted to have it on the record**
11 **today.**

12 A Yes, that's right.

13 **Q So what's shown here in this little graph,**
14 **it looks like the number of visitors is going down.**

15 A That is correct.

16 **Q Do you know why that might be?**

17 A Well, generally in the pay-to-click
18 industry, a lot of pay-to-click websites actually
19 right now are having a bit of a downward turn. It
20 could be just seasonal or -- I don't know. There's --
21 some websites just have the ups and downs. But right
22 now in the pay-to-click industry a number of websites
23 are going down. Plus, Traffic Monsoon, we've been
24 working very hard because -- you probably noticed
25 this in the membership database that I sent -- within

1 **Q You're eliminating --**

2 A Yes. We're reducing the bots. And one of
3 the things that we did was before people can click on
4 those cash links, they have to now upload an I.D. So
5 we want to make sure that we're identifying whether
6 these people are real people or not. Because we were
7 using IP addresses, and we've been using a number of
8 different other algorithms just to help catch people
9 who are using similar details and data and blocking
10 those types of people out. But they get more
11 sophisticated. The better that you get at blocking
12 them, the better they get at beating you. So it
13 becomes kind of a game of chess where it's like, ha,
14 got you, and then they overcome you, and then you
15 have to beat whatever it is they've come up with to
16 avoid the detection that they're just not a real
17 person.

18 **Q This is off the subject, but is it you**
19 **who's doing this, for example, trying to eliminate**
20 **the robots?**

21 A Me and my programmer both. We come up with
22 different ideas. Sometimes he comes up with some;
23 sometimes I come up with some.

24 **Q It's hard to understand how you can run**
25 **this thing all by yourself.**

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1 A I get that a lot.
 2 **Q On the next page of Exhibit No. 2 --**
 3 A Okay.
 4 **Q -- that you have there. So it says 3.18**
 5 **members total.**
 6 A Uh-huh.
 7 **Q Here's this term "members" that we spoke**
 8 **about at the beginning. So does this figure include**
 9 **free and -- free members --**
 10 A Free and paid.
 11 **Q -- and advertisers?**
 12 A Yeah. Free, paid members, advertisers. It
 13 includes everybody who has ever signed up, including
 14 those fake ones.
 15 **Q Okay. And I think you mentioned when you**
 16 **came in earlier that most of the members are free**
 17 **members. Is that right?**
 18 A That is correct, yes.
 19 **Q Do you have a sense currently of how many**
 20 **are free and how many are paid?**
 21 A The last time I checked, it was about
 22 162,000 are paid. They've purchased something from
 23 the website.
 24 **Q That's how you define paid?**
 25 A Yes.

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1 **Q And they could be any of the products**
 2 **that --**
 3 A Any of the services that are offered,
 4 uh-huh.
 5 MR. FROST: And that includes the
 6 pay-per-click people?
 7 THE WITNESS: Anyone who's purchased any
 8 service would show up as a paid individual, yeah,
 9 someone who has made a purchase.
 10 MR. FROST: Of the 162,000, how many are in
 11 the U.S., approximately?
 12 THE WITNESS: I don't remember. I sent
 13 that number to you. I think it was -- was it 14,000?
 14 BY MS. OKINAKA:
 15 **Q 14,000, yes.**
 16 MR. FROST: Okay. So that's about the same
 17 number.
 18 THE WITNESS: Yeah.
 19 MR. FROST: Is most of your growth coming
 20 from outside of the U.S.?
 21 THE WITNESS: That is correct. Uh-huh,
 22 yes.
 23 BY MS. OKINAKA:
 24 **Q Do you know in what countries?**
 25 A I've got a list of it in my back office. I

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1 could send you that report if you would like.
 2 **Q I don't know if you need to. But we can**
 3 **ask you for it later.**
 4 A Sure.
 5 **Q Yeah, okay. We'll take it.**
 6 MR. FROST: If you have it.
 7 THE WITNESS: Sure. Yeah, absolutely.
 8 BY MS. OKINAKA:
 9 **Q In these other countries, do you use other**
 10 **domains besides TrafficMonsoon.com?**
 11 A Traffic Monsoon?
 12 **Q Do you have different websites or domains**
 13 **for different countries?**
 14 A No.
 15 MR. FROST: Like Traffic Monsoon --
 16 THE WITNESS: -- dot FR for French?
 17 MR. FROST: Yeah.
 18 THE WITNESS: No. They're all just using
 19 the dot-com.
 20 BY MS. OKINAKA:
 21 **Q Are you using different payment processors**
 22 **in foreign countries?**
 23 A No. Just using all of the same for
 24 everybody.
 25 **Q Also, on the second page of Exhibit No. 2,**

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1 **at the very bottom you're talking about the business.**
 2 **And you say, "There is truly no risk to our revenue**
 3 **sharing plan, because the quality of advertising**
 4 **services you're paying for outweigh the price."**
 5 **Can you explain your basis for saying that?**
 6 A Sure. Basically looking at the services
 7 that we offer, people don't -- they don't feel a risk
 8 when they're buying services on EasyHits4U. If
 9 they're going to spend \$5.95 on EasyHits4U for a
 10 thousand credits or go to ilovehits and spend \$10 for
 11 a thousand hits or go to any of these number of
 12 different traffic exchanges, they're not looking at
 13 it as a risk, they're looking at it as an advertising
 14 purchase. So that's why I say there's no real risk
 15 here. You're buying a service.
 16 So I wanted to clearly identify what people
 17 are buying here is the same exact services that
 18 they're buying on other traffic exchanges. The only
 19 difference is we'll actually allow you to qualify and
 20 share in the revenue that's generated from the same
 21 sales of the same services that they're getting from
 22 anywhere else.
 23 **Q So you're saying that they can see, I'm**
 24 **buying a gallon of milk; I know the price is this;**
 25 **the price at other places is that?**

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1 A Yeah, exactly.
 2 **Q So in that sense there isn't --**
 3 A Right. You don't feel like a risk when
 4 you're buying milk, because it's not an investment.
 5 MR. FROST: Okay. You mentioned -- what
 6 was it? Easy Hits?
 7 THE WITNESS: EasyHits4U.
 8 MR. FROST: Okay. How is what you offer
 9 better quality than what they're offering?
 10 THE WITNESS: I'd say it's exactly the same
 11 service. What's going to make it a different quality
 12 is their visitors are only their own. I'm using
 13 other traffic exchanges and pay-to-click websites to
 14 help deliver the visitors. Also, their banner
 15 services are impression-based, where my services for
 16 banners are per-click-based.
 17 BY MS. OKINAKA:
 18 **Q So I don't understand what impression-based**
 19 **is.**
 20 A So impression is when -- it's just a
 21 display. And so if you are spending let's say five
 22 dollars for a thousand displays, those thousand
 23 displays can go by fast. And then before you know
 24 it, your five dollars has been spent, you didn't get
 25 a single click on your banner, and you can feel like

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1 you just lost five dollars and didn't get really
 2 anything for it other than it did display the banner
 3 that you wanted to display.
 4 What Traffic Monsoon is offering is instead
 5 of display advertising, it's pay-per-click, like what
 6 Facebook or Google offer, is that your ad will
 7 continue to display until it gets the clicks that you
 8 paid for. That way you're actually getting
 9 something, I feel like.
 10 **Q You know they at least had to click on it?**
 11 A Right. That's correct.
 12 MR. FROST: Are those ads some of the ads
 13 that appear on the Traffic Monsoon website that
 14 members can click on?
 15 THE WITNESS: Through the traffic exchange?
 16 MR. FROST: Yes.
 17 THE WITNESS: Those are -- if you're
 18 looking at the second -- actually, third page, the
 19 traffic exchange credit purchases are on the left. So
 20 that would be the thousand visitors for 5.95. So
 21 those are the visitor credits within the traffic
 22 exchange. So when people are clicking through the
 23 traffic exchange, they would be using up those
 24 credits that someone else might have purchased.
 25 MR. FROST: Okay.

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1 THE WITNESS: But the banner clicks, those
 2 are completely separate. It's a different service.
 3 MR. FROST: The banner credits, then, don't
 4 show up on the Traffic Monsoon -- if I'm a member of
 5 Traffic Monsoon and I have to click ten ads, am I
 6 clicking on the ads that you just talked about?
 7 THE WITNESS: Through the traffic exchange.
 8 So you wouldn't be clicking people's banners but
 9 you'd be clicking through the traffic exchange.
 10 MR. FROST: Where would the banners be
 11 displayed?
 12 THE WITNESS: On just about every single
 13 page, and also on our Ads Plan page -- or not Ads
 14 Plan, but Ad -- let me see if it's got it on this.
 15 BY MS. OKINAKA:
 16 **Q We have other pages from your website, too.**
 17 **If you want us to print it, we can.**
 18 A Okay. It's the web exposure page -- or it
 19 might say ad exposure. I don't remember which term I
 20 went with, but I think it's ad exposure or web
 21 exposure.
 22 Anyway, so when you click on that, it has
 23 all of these banners and text stats that are on
 24 rotation, as well as we have rotators that are
 25 displaying people's websites on other traffic

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1 exchanges. Banners display up there. Banners
 2 display on the main member dashboard when people log
 3 in. So if they're logging in, then right in their
 4 face are other people's advertisements right in front
 5 of them.
 6 MR. FROST: All right. So it's not ads
 7 that they have to go outside your network to view?
 8 THE WITNESS: They wouldn't. But people --
 9 like I said, with the rotator link, I'm using that
 10 link on other traffic exchanges and websites. Also,
 11 I'm using that web exposure page on other traffic
 12 exchanges and pay-to-click websites, so that exposure
 13 is being displayed in front of people who are on
 14 other traffic exchanges and pay-to-click websites.
 15 Even if they're not logging into Traffic Monsoon,
 16 they'll see those advertisements.
 17 MR. FROST: Okay.
 18 BY MS. OKINAKA:
 19 **Q So can you explain again what the -- on**
 20 **this third page what the traffic exchange credit**
 21 **purchases are? This is your ability to buy visitors**
 22 **to your website; is that right?**
 23 A That is correct. With the traffic
 24 exchange, what you can do is you can click through
 25 the traffic exchange and earn visitor credits for

1 free by simply visiting other people's websites. And
 2 that's what you can do on Traffic Monsoon, too. And
 3 just like any other traffic exchange, there are
 4 people who say, you know what, I want a thousand
 5 visitors to my website, but I don't want to visit
 6 2,000 people's websites to do that.

7 **Q I'd rather just pay --**

8 A I'd rather just pay the \$5.95 and get the
 9 visitors.

10 **Q So this 1,000 visitor credits for \$5.95**
 11 **that's on this third page of Exhibit 2, is this the**
 12 **same service that's part of what you get when you buy**
 13 **an ad pack?**

14 A It is, yes.

15 **Q And then on the right it talks about**
 16 **Monsoon Traffic packages. And what's that?**

17 A What that is is -- the difference --
 18 traffic exchange is going to deliver visitors from
 19 both within Traffic Monsoon and outside. The Monsoon
 20 Traffic packages are only going to deliver traffic
 21 outside of Traffic Monsoon.

22 **Q To outside?**

23 A Right. So if someone has desire, let's
 24 say, even to promote Traffic Monsoon, they can spend
 25 five dollars and have 2,500 visitors go to their

1 Traffic Monsoon referral link if they want, because
 2 it won't be displayed to anyone who's already a
 3 member of Traffic Monsoon within Traffic Monsoon. It
 4 would be on like NeoBux or Clixsense or EasyHits4U.
 5 It will be displayed on outside advertising
 6 resources.

7 MR. FROST: Why is that less expensive?

8 THE WITNESS: It's because I wanted --
 9 well, I have good discounts through these other
 10 websites. And also, I wanted that to be a more
 11 popularly used service instead of using the credits
 12 within the traffic exchange. I wanted people to
 13 surf. See, if people can surf and get -- how do I
 14 explain this better? It's -- if people can buy
 15 credits through the credit -- or the traffic exchange
 16 cheaply, then where's the encouragement to surf? So
 17 I want that to be the more expensive service because
 18 I want people to prefer surfing, because we need to
 19 deliver the traffic. Does that make sense?

20 MR. FROST: Deliver the traffic to members?

21 THE WITNESS: Right, through the traffic
 22 exchange.

23 MR. FROST: Okay. And you mentioned that
 24 you're able to purchase at a discount. Does that
 25 mean you buy the clicks from these other services at

1 a discount?

2 THE WITNESS: I'll buy in bulk. So the
 3 main buyers, they generally might buy the thousand
 4 visitors for 5.95 kind of a thing. But if I'm buying
 5 50,000 visitors for the 229.95, for example, then if
 6 someone's only getting a thousand visitors, I'm
 7 getting 50,000. And the dividing through, I'm then
 8 generating a profit margin on that purchase.

9 MR. FROST: So the outside visitors, the
 10 ones that are 2,500 visitors for five dollars, are
 11 those all credits you will purchase through other
 12 websites?

13 THE WITNESS: Right. So when people are
 14 spending five dollars to get 2,500 visitors, what
 15 I'll do is, for example, go to NeoBux and spend \$550
 16 on a million visitors. But the average visitor
 17 there, they might be spending five dollars for 2,500
 18 visitors as well. But when I have the larger bulk
 19 purchase, I'm getting the discount.

20 MR. FROST: And that's where some of the
 21 profit comes from that you're sharing, then?

22 THE WITNESS: That's right.

23 BY MS. OKINAKA:

24 **Q Are you good? Do you want to take a break?**

25 A I'm fine.

1 **Q Okay.**

2 (SEC Exhibit No. 3 was
 3 marked for identification.)

4 **Q I'm going to show you Exhibit 3. It's from**
 5 **another part of the Traffic Monsoon website, the**
 6 **frequently asked questions.**

7 A Okay.

8 **Q Just have a few questions about this.**

9 **Who wrote this?**

10 A I did.

11 **Q I can't see what date you printed this off,**
 12 **but has it changed recently?**

13 A No, it has not, unless it was to remove
 14 PayPal from --

15 **Q I saw that.**

16 A Yeah.

17 **Q It does -- it says Payza, I think.**

18 A Okay.

19 **Q Oh. There's a very small number up at the**
 20 **top. So May 16th was when I printed it.**

21 A Okay.

22 **Q So it probably hasn't changed, Do you**
 23 **think?**

24 A Probably not, no. Hasn't changed in
 25 months.

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Q So you have a section here on the first page -- is Traffic Monsoon a HYIP, H-Y-I-P --

A Uh-huh.

Q -- on the pyramid scheme or illegal. And you say, "Traffic Monsoon offers quite a lot of advertising services of the highest possible quality and delivers them quickly. When people buy these services, their revenues are held by the company."

So does that include the \$50 people spend to buy the advertising ad pack?

A It includes every service; and just like what it says at the top there, "This is not an investment site...in any way, shape, or form." It's not what we're doing.

Q Can you explain that?

A Can I explain that it's not an investment?

Q Well, the reasons why you say it's not an investment site.

A The reason I said that is because people were asking whether this was an HYIP, which is a high-yield investment plan type of a site. And I wanted to make sure that people recognized that we're a traffic exchange. We're not one of those types of deals. And I don't want anyone to ever treat it like one of those types of deals.

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We do sell advertising. We allow people to surf in our traffic exchange, earn free advertising credits. But if people have purchased an ad pack, then we want to be able to share the revenue with them as they qualify. So it's a reward for active surfing. So it's not an investment.

Q The profit sharing is a reward?

A Right. It's just a reward saying, you know what, you've surfed -- you know, like with EasyHits4U, for example, if you've surfed a number of ads, then you get 25 cents or you might get this extra credit pack or whatever. I just figured it seemed to be a good idea, since these people are actually surfing, to actually give them a portion of the sales revenues that are generated for the ads that they are surfing.

Q So it talks about how the business works. It mentions on the second page, you'll receive 10 percent commissions when someone you refer buys a true and legitimate advertising service.

A That is correct.

Q Can you describe how that works?

A So let's say, for example, you need visitors to your website. And I say, look, Traffic Monsoon, you can get a thousand visitors to your

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website for 5.95. And then you're like, wow, really?

And I can give you my referral link, you can sign up, and then you can make a purchase. When you complete that purchase, I'll get 59 cents commissions.

Q 10 percent?

A 10 percent commission, uh-huh.

Q If I buy -- so the commission is based on the amount of services the person I referred buys from Traffic Monsoon; is that right?

A Right. So if I'm referring someone to use the service and they like it and they continuously use it, then I'll continuously get commissions from every single purchase of the service that they ever make.

Q Okay. So that was going to be my next question. So say I buy an ad pack for \$50. Time goes by, and my revenues reach 55. I decide to leave the money in Traffic Monsoon and to buy ad packs. Is a 10 percent referral paid on that?

A So, yes. People can use their account balance to make additional advertising purchases, absolutely. And each time that there's that purchase, then the 10 percent commissions are rewarded to the referring sponsors.

Q So you'll always be my referring sponsor?

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A That's right.

Q Okay. You mentioned too that it's a single level commission structure?

A That's correct.

Q Can you explain that?

A What that means is if I refer you to buy advertising services on Traffic Monsoon, and then you might refer Scott, I won't benefit from Scott's purchases at all. You'll get the 10 percent commissions, but I'll receive no commission for those purchases. So it's not multilevel, it's just a single level referral commission.

Q We're going to talk about the ad packs later, but I wanted to ask you about a couple things in here.

MR. FROST: You mentioned earlier after we looked at the Exhibit No. 2 where -- I think it's on the third page -- the visitor credits -- for a thousand visitor credits it's 5.95. How much do banner ads cost? Is that somewhere else on your website?

THE WITNESS: It's on the Ads Plan page. And it talks -- it explains that it's 25 cents per click, or 50 cents per click if you do the country targeting.

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1 MR. FROST: Oh, okay.
2 (SEC Exhibit No. 4 was
3 marked for identification.)

4 BY MS. OKINAKA:

5 **Q Here's Exhibit 4. And it's from your**
6 **website, a portion regarding ad plans, and it was**
7 **printed on April 25th of this year.**

8 A Okay.

9 **Q Do you know who wrote this?**

10 A I wrote it.

11 **Q Has it changed since this date, April 25th?**

12 A No.

13 **Q I meant to ask you about these three --**
14 **well, with regard to your entire website, did you**
15 **have any advice from a lawyer or any other kind of**
16 **professional to do that?**

17 A Never.

18 **Q Let's see. So we were talking about the**
19 **cost of the banner ads.**

20 A I guess I did. Dennis Burke, he was an
21 attorney. He was retained because we lost PayPal and
22 they're holding onto the funds. And so one of the
23 things I asked him to do is review the business,
24 whether it was -- if we had been doing anything
25 illegal or anything. And he checked through it and

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1 A Okay.

2 **Q So the first thing you have on Exhibit 4**
3 **here after "Philosophy" is "Cash Links." And I know**
4 **we keep asking you to explain the different aspects**
5 **of your business, but can you explain how this works?**

6 A Sure. What cash links are is just how it
7 says, that they're pay-to-click links. And what
8 pay-to-click basically is is there's an advertiser
9 who has purchased visitors to their website, and then
10 the visitor actually gets paid to visit that website
11 from the money that was spent for the visitor. So
12 that's where it says basically one dollar is 50
13 visitors. So it breaks it down, saying that when you
14 divide that one dollar by 50 visitors, that's each
15 visitor's two cents in value. One penny goes to the
16 clicker and one penny goes to the person who referred
17 the clicker.

18 **Q It speaks now and then about member**
19 **dashboards. And what is that?**

20 A The dashboard is when someone just barely
21 logs in. It's just a main member page once when they
22 log in. It's not any of the menu options that they
23 go into. It just shows their statistics from their
24 account, whatever it is.

25 MR. FROST: Maybe I'm missing this; but it

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1 he said, "I don't see anything wrong with it."

2 **Q When was that?**

3 A That was in -- I want to say March or
4 April -- March.

5 **Q Of this year?**

6 A Uh-huh, yes. I think I paid the initial
7 retainer in February, but I was asking him about
8 whether it was legal and everything in March, I
9 believe. Maybe April.

10 MR. FROST: Did he give you some kind of an
11 opinion letter or any kind of a memo describing what
12 his opinion --

13 THE WITNESS: No. It was just over --
14 verbally over a conference call.

15 BY MS. OKINAKA:

16 **Q Was the client you or Traffic Monsoon,**
17 **or --**

18 A I guess either way. I'm the same.

19 **Q If we wanted to talk to Dennis about your**
20 **conversation, would you -- you would be waiving the**
21 **attorney-client privilege on behalf of the company,**
22 **though.**

23 A Sure, I can do that.

24 **Q Okay. Well, we'll let you know when we do**
25 **that.**

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1 talks about the pay-per-click, and the one dollar
2 equals -- or one dollar is 50 visitors. Who pays the
3 one dollar?

4 THE WITNESS: The advertiser. So someone
5 who wants visitors to their website.

6 MR. FROST: So in your case, who pays the
7 dollar?

8 THE WITNESS: So, for example, on that
9 sheet that I showed you, the sales of all of the
10 different services, cash links -- when people are
11 buying the cash links, that's what they're buying is
12 this service. And so they can select how much -- the
13 lowest transaction -- someone, I guess, discovered
14 you could enter a decimal and go down lower than a
15 dollar. That wasn't programmed in, but each visitor
16 is divided up for the dollar. And then 50 visitors.

17 MR. FROST: So you sell them and you buy
18 them?

19 THE WITNESS: So I sell them -- and this is
20 a different service from the traffic exchange. So
21 when people are logging in, just like what it says on
22 the dashboard. So when you log in, on the dashboard
23 there's a button. And originally it was all of the
24 cash links that people could click. It would say,
25 claim one penny here, claim two pennies, or claim

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1 half a penny, you know, whatever the amount to claim
2 is.

3 But what we've discovered for optimization
4 reasons is so many people who were logging in were
5 accessing information on their dashboard but not
6 needing to see those cash links. And each time those
7 cash links were loaded, it caused a lot of extra load
8 on the database and on the server. So we put those
9 cash links on their own page.

10 So when you log in, there's a button that
11 says click here to go to the cash links. So that's
12 what it's talking about here. So when they log in,
13 they'll see the button to go to the cash links. Then
14 each of the links, when they click on it, they can
15 claim a penny. And that penny is coming from the
16 person who has purchased a service in of itself.

17 BY MS. OKINAKA:

18 **Q And that could be someone within Traffic**
19 **Monsoon or --**

20 A In their account balance. So it could be
21 anybody, but they do have to sign up. Just like with
22 Google advertising, you have to sign up for Google to
23 use Google advertising. So with Traffic Monsoon, you
24 have to sign up to create an account, and then you
25 can make a purchase for advertising if you want.

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1 MR. FROST: So if we look at the third page
2 of Exhibit 4 where you talk about the services -- and
3 we'll go into more of this later.

4 THE WITNESS: Okay.

5 MR. FROST: But the pay-per-click banner
6 ad, that's where people would pay to have visits to
7 their website; and then what we have on the first
8 page is people visiting the website and getting paid
9 to visit it?

10 THE WITNESS: Right. That's correct. So --

11 BY MS. OKINAKA:

12 **Q Those are the two sides of that.**

13 A So there's a few different reasons for that
14 is with incentive clicking, people are just clicking
15 because they want to get paid. And there's actually
16 really great results with that. I advertise that way
17 myself, and that's one of the reasons I've been able
18 to grow the business as large as it is because I've
19 used that kind of advertising resource on other
20 pay-to-click websites. But there are some people who
21 are wanting more results and not have to spend as
22 much for those same kind of results.

23 So with pay-per-click, people generally
24 don't click on a banner or text ad unless they're
25 interested in what it is that they're seeing in the

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1 banner or interested in the content that's written in
2 the text ad. So those text ads will keep displaying
3 and displaying and displaying until someone's like,
4 hey, you know what, that's exactly what I'm looking
5 for. They'll click, and those visitors are worth
6 much more than the visitors of someone just click and
7 click, click, click, click through. Because even
8 though there's results there, they'll get a lot more
9 visitors that way. So it's just another advertising
10 service.

11 MR. FROST: Okay.

12 THE WITNESS: But I hope that
13 differentiates what the difference is.

14 MR. FROST: No, I appreciate that, because
15 that does help explain it.

16 And then under the services on the third
17 page still, you talk about the pay-per-click
18 campaigns are 25 cents per click and then 50 cents a
19 click if you specify a country.

20 THE WITNESS: That's right.

21 MR. FROST: Are those the banner ads that
22 we were talking about?

23 THE WITNESS: So people can purchase banner
24 advertising as well as text ads, and they're both
25 pay-per-click.

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1 MR. FROST: So if someone buys an ad pack
2 that includes a thousand clicks and 10 banner clicks,
3 these are the banner clicks that they get?

4 THE WITNESS: Well, it's -- actually,
5 they're rewarded 20 clicks.

6 MR. FROST: Oh, 20.

7 THE WITNESS: So 20 click credits with an
8 ad pack and then a thousand visitors through the
9 traffic exchange.

10 MR. FROST: It would be 20 clicks at 25
11 cents or 20 clicks in a specific country?

12 THE WITNESS: It could be both.

13 BY MS. OKINAKA:

14 **Q But they're different prices.**

15 A Uh-huh. But that's what they're getting
16 with their ad pack is it's a combination of the
17 services.

18 MR. FROST: So are they getting half of one
19 and half of the other, or -- I mean, I'm just
20 wondering, if you get 20 clicks to your banner, which
21 one would you be getting?

22 THE WITNESS: Well, what I was looking at
23 here is if people are buying the services anywhere
24 else, let's say on Facebook, what's the actual value
25 of the click? People are paying two dollars, three

1 dollars, four dollars on Facebook to get a click for
 2 whatever it is that they're servicing on Facebook.
 3 So what I looked at is, okay, I want to
 4 give a lot of value, so 20 clicks plus a thousand
 5 visitors in the traffic exchange. And I thought,
 6 well, what I want to do is create a discount where
 7 people aren't going to get it through this ad pack; I
 8 want to actually create an even lower price. So what
 9 some people have done is like what you just did is,
 10 if you're selling these lower price, then why is it
 11 higher within the ad pack? What I do is I had the
 12 value there but created a lower cost for people who
 13 want to buy it separately.
 14 MR. FROST: Okay. And I'm not trying to
 15 dispute the value of the ad pack.
 16 THE WITNESS: Sure.
 17 MR. FROST: I'm just trying to understand
 18 which one of --
 19 THE WITNESS: But you're right; it would be
 20 the traffic exchange visitor credits and then the
 21 banner ad campaigns, the pay-per-click. So they're
 22 getting a combination of those services with the
 23 sharing position when they buy an ad pack.
 24 MR. FROST: Okay. It could be either 25
 25 cents or 50 cents per click; it could be country

1 specific or not?
 2 THE WITNESS: Right, uh-huh.
 3 BY MS. OKINAKA:
 4 **Q So if I buy an ad pack and I want the**
 5 **country-specific and Scott buys one and he wants the**
 6 **25-cent one, then I feel like I would be getting more**
 7 **value.**
 8 A Actually, now that I think about it, with
 9 the ad pack it's not country targeted.
 10 **Q It's 25 cents per click. Okay.**
 11 A So you're getting non-country targeted. But
 12 you're not paying 25 cents per click, you're just
 13 getting 20 click credits.
 14 MR. FROST: Right. So the only way you can
 15 get this low of a price --
 16 THE WITNESS: -- is to buy it outside the
 17 ad pack.
 18 MR. FROST: Okay. That makes sense.
 19 BY MS. OKINAKA:
 20 **Q I guess since we're on page 3, we're going**
 21 **to go through these boldfaced services. And you**
 22 **talked about the first two, right?**
 23 A That's right.
 24 **Q And what is the traffic exchange start**
 25 **page?**

1 A When someone starts surfing the traffic
 2 exchange, they'll see a page first. That's their
 3 start page. And so this is the very beginning of
 4 someone's surf day. So people are much more alert.
 5 It's the very first page they're seeing, so that is
 6 sold as a service separately.
 7 **Q So I can buy -- then people see my page**
 8 **first?**
 9 A That's right.
 10 MR. FROST: And just to clarify, the cash
 11 links from the first page of Exhibit 4, they're not
 12 part of their sharing services?
 13 THE WITNESS: Right. That's correct.
 14 MR. FROST: So any revenues that come in
 15 from cash links --
 16 THE WITNESS: -- are completely not related
 17 to what's being shared through revenue sharing.
 18 That's correct.
 19 MR. FROST: Okay.
 20 BY MS. OKINAKA:
 21 **Q Oh, all right. So this list on the third**
 22 **page of Exhibit 4, are these the services from which**
 23 **profits are shared --**
 24 A That is correct.
 25 **Q -- if you're in the profit sharing**

1 **position?**
 2 A Right. That is correct.
 3 **Q Okay. And what are traffic exchange credit**
 4 **purchases?**
 5 A That would be what we were looking at in
 6 Exhibit 4.
 7 **Q This one we've got now?**
 8 A Let's see.
 9 **Q Exhibit 2?**
 10 A On page 4 of 7.
 11 **Q Okay. This is the visitor credits that I**
 12 **can buy if I don't want to click -- earn them by**
 13 **clicking?**
 14 A That's correct.
 15 **Q Okay. What is the Monsoon Traffic package?**
 16 A That would be also on that same page of
 17 Exhibit 4, starting at the bottom of page 4 --
 18 **Q Okay. Oh, we talked about those.**
 19 A -- and continuing on through page 5.
 20 **Q Got it. And what are login ads?**
 21 A Login ad is -- when people are logging into
 22 the website, there is a website that comes up on
 23 display. So everyone sees that when they're logging
 24 in, so that's what a login ad is.
 25 **Q On the -- we're thinking we'll finish with**

1 this exhibit and then maybe take a break. Sound
 2 good?
 3 A Okay.
 4 Q Just going back to the page before, page 2
 5 of Exhibit 4.
 6 A Page 2 of Exhibit --
 7 Q It talks about sharing.
 8 A Yes.
 9 Q It says "Only one of the services we offer
 10 includes a revenue sharing position." And which
 11 service is that?
 12 A That's the ad pack.
 13 Q Okay. That's the \$50 --
 14 A That's right. That's what it says here is
 15 that "when you purchase an AdPack combo advertising
 16 campaign for \$50, you'll receive 20 clicks to your
 17 banner, 1,000 traffic exchange credits, and a revenue
 18 sharing position."
 19 Q And as you said, the revenue that I'm
 20 sharing in is coming in from the services listed on
 21 the following page?
 22 A That's right. That's correct.
 23 MS. OKINAKA: We'll go off the record and
 24 take a break.
 25 (A brief recess was taken.)

1 (Whereupon, at 11:35 a.m., a luncheon
 2 recess was taken.)
 3 AFTERNOON SESSION
 4 BY MS. OKINAKA:
 5 Q So we're back on the record at 12:34. And
 6 while we were taking a break, we didn't talk about
 7 this case, did we?
 8 A No, we did not.
 9 Q Just some miscellaneous questions for you
 10 before we go on. You mentioned that you have
 11 contacts, or you're friendly with people at Payza and
 12 SolidTrust?
 13 A That's right.
 14 Q Do you have the names of those people that
 15 are your contacts there?
 16 A With Payza, Firoz Patel. And SolidTrustPay
 17 is -- I remember I froze up on her name last time.
 18 Q That's all right. Well, maybe you can --
 19 do you have it in your phone? Maybe when we take
 20 another break, you could take a look.
 21 A Yeah, I do. Stella. That's her name,
 22 Stella.
 23 Q Well, and if you have phone numbers for
 24 them and want to check them --
 25 A I reach them on Skype.

1 Q Oh, okay. So you don't have a phone
 2 number, then?
 3 A Not for Stella. For Firoz Patel I do now.
 4 Q Do you remember Stella's last name?
 5 A No, huh-uh. I only know her by her first
 6 name. I could probably look it up. Might be on her
 7 Skype.
 8 Q Okay.
 9 A Just -- her name is Stella.
 10 Q Okay. Do you have a phone number for her?
 11 A It's a Skype username.
 12 Q No, that's okay.
 13 A Okay.
 14 Q Let me show you -- oh, well, I just wanted
 15 to ask you briefly about Snoork again.
 16 A Okay.
 17 Q I know we talked about that when you came
 18 in before. But it's your web host; is that right?
 19 A That's right. They're a hosting company.
 20 Q And what data does it host?
 21 A Everything with my website, yeah.
 22 Q And does it also host any back office
 23 administrative data that you have?
 24 A Well, what it is is when you have a server
 25 that contains everything. So when I log in to my

1 site, I am accessing a -- the information that's in
 2 the database is in their servers.
 3 Q Uh-huh. So do you have -- you have an
 4 admin panel, don't you?
 5 A Yes, I do.
 6 Q What do you see on there?
 7 A When I log in, I can see all of the
 8 members; I can see what their balances are; I can
 9 look at their addresses, phone numbers, the
 10 information that they've entered. Pretty much
 11 anything. I can see everything except for certain
 12 things that I didn't think about having my programmer
 13 ask. So that's when I just have him build something
 14 in if I need to have him pull records or whatever.
 15 Q I think we talked about this before, too,
 16 but I think you said you don't keep financial
 17 statements as such for Traffic Monsoon. Is that
 18 right?
 19 A Like, what kind of statements?
 20 Q Like a balance sheet and an income
 21 statement.
 22 A It's all in the database, so it's all saved
 23 in that cash table. So everything that's in--out,
 24 it's there. And then the payments coming in for
 25 purchases of service are on that pay-ins table.

1 **Q** The thing you sent us for the data since
2 December?

3 A Uh-huh.

4 **Q** Okay. Yeah, we have that to show you also.
5 And you don't keep your -- so you don't use an
6 accounting software like QuickBooks or anything?

7 A No. Too much data. It wouldn't fit.

8 **Q** Yeah.

9 Let me show you Exhibit 5.
10 (SEC Exhibit No. 5 was
11 marked for identification.)

12 A Okay.

13 **Q** It's another part of your website that's
14 headed "Terms."

15 Did you write this?

16 A Yes, I did.

17 **Q** Did an attorney help you write it?

18 A No.

19 **Q** I just want to ask you about a couple of
20 things. The first thing is on the second page,
21 there's a paragraph No. 2 where you say -- you talk
22 about when we send you payments, we don't want you to
23 refund it, and if you do, we'll accept that as a gift
24 back to Traffic Monsoon. I wondered what the reason
25 for this was.

1 A Well, what we discovered is that sometimes
2 people do hit the refund button. And what happens is
3 if we send them money, if we get a refund, then it
4 adds a lot of extra workload. So we put it in the
5 terms saying, don't do that.

6 **Q** But there is a refund button?

7 A Yeah. If someone receives a -- like in
8 PayPal, for example, if you receive a payment from
9 Traffic Monsoon, it shows, you know, kind of a
10 breakdown of what you received, if there's any fee,
11 the total amount, and then underneath that is refund
12 so they can refund back to Traffic Monsoon. So we
13 just wanted to make sure people knew, keep that;
14 don't press the refund button, please.

15 **Q** Okay.

16 A And it's a very similar term of service
17 that's actually in NeoBux's terms of service. They
18 say that if you refund any money back to us, we'll
19 ignore the refunds. So it's very standard within the
20 industry. So I kind of just took what other
21 pay-to-click websites have in their terms of service
22 and just kind of put my own wording to it.

23 **Q** Okay. And then on the next page, paragraph
24 5 --

25 A Okay.

1 **Q** -- you say -- I wonder why you put this in:
2 You agree to recognize Traffic Monsoon as a true
3 advertising company which shares its revenues, and
4 not as an investment.

5 A I just wanted to make sure that it was
6 clear that when people are getting started with
7 Traffic Monsoon, that if they do choose to purchase
8 an advertising service with us, or with me, I guess
9 with the company, that they're not investing. I want
10 them to recognize that that is what they are getting
11 involved with. And so it's been there since the very
12 beginning of the company.

13 **Q** It sounded like you also wanted to make
14 sure they don't represent to others --

15 A That it's that as well, right.

16 **Q** Was that part of your idea there?

17 A Absolutely. Absolutely. Because I think
18 that I was -- I mean, it's been a while since I've
19 read my own terms of services, but I seem to remember
20 that we have in there saying that if you're selling
21 Traffic Monsoon services, that you need to sell it
22 according to what is actually on the website.

23 **Q** Oh, you have it sort of at the bottom of
24 page 2. And -- well, any income promises
25 inconsistent --

1 A Only promote Traffic Monsoon using legal
2 methods, right. "Any income promises or guarantees
3 inconsistent with the information provided by Traffic
4 Monsoon may result in a permanent account
5 suspension."

6 **Q** Well, let's ask you about the ad packs.

7 A Okay.

8 **Q** We've talked about a little of this
9 already. But -- so the advertiser, I guess, member
10 puts in \$50, right?

11 A Well, you're saying "put in."

12 **Q** Pays \$50.

13 A But makes a purchase of \$50 to receive an
14 ad pack, yes.

15 **Q** And for that he gets a thousand visitor
16 credits in the traffic exchange is one thing he gets.
17 And those are -- we already saw that they're priced
18 at 5.95 if you were buying them on their own. Is
19 that right?

20 A Right.

21 **Q** And then he also gets 20 clicks to his
22 banner. What would he pay if he bought those clicks
23 separately from Traffic Monsoon?

24 A It's 25 cents per click or 50 cents per --
25 with the country, right.

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1 **Q But we've decided they're just getting the**
2 **25-cent clicks, I think.**

3 A Right, they are. That's right.

4 **Q Okay.**

5 A But, like, what I was explaining before is
6 that the value of these clicks, like, if you were to
7 look at the market of how much people are paying for
8 that type of service, it's comparable. Like what I
9 was saying with Facebook, people are paying three,
10 four dollars for a click on an ad. So if you're
11 looking at that kind of a value of giving them 20
12 clicks for \$50 on a banner plus a thousand visitors,
13 but outside of the ad pack with the sharing position
14 I wanted to give people lower prices --

15 **Q Uh-huh.**

16 A -- so that people would want to possibly
17 purchase those services more than the ad pack.

18 **Q So the 20 clicks to the banner, if it's 25**
19 **cents a click, is it ten dollars?**

20 A I'm sorry. What did you ask?

21 MS. OKINAKA: Did I have that right?

22 MR. FROST: No. Five dollars.

23 BY MS. OKINAKA:

24 **Q Five dollars, okay. So I was just saying**
25 **if I buy the 20 clicks to my banner not as part of**

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1 could be one, two, three dollars per click.

2 **Q One to three per click.**

3 **I was going to ask you about the breakdown**
4 **of the -- the \$50 comes in and what it's used for.**

5 **And that's in one of the e-mails you sent us --**

6 A Yes, uh-huh.

7 **Q -- so I'm going to grab that.**

8 **(SEC Exhibit No. 6 was**
9 **marked for identification.)**

10 **Q Before we show you this, we have a few more**
11 **questions.**

12 A Okay.

13 MR. FROST: I just had a couple of
14 questions about the ad packs.

15 If I'm, I don't know, an affiliate marketer
16 and I see that I could buy clicks to the traffic
17 exchange and clicks to the banner for about \$10, why
18 would I pay 50?

19 THE WITNESS: That's the whole idea. That's
20 why I made the lower prices outside of the sharing
21 position package, because I wanted to aim at having
22 more sales on the services that didn't have sharing
23 positions than those that had a sharing position.
24 That was my aim when setting it up that way, putting
25 those pricing -- having a better discount not to have

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1 **the ad pack, I'd pay five dollars?**

2 A It would be less, right, on our website.
3 But like I said, the value -- I wanted to give the
4 discount outside of the ad pack. But market value,
5 like I've already said, Google and Facebook, people
6 are spending much more per click than this, for sure.

7 **Q We wondered how you got -- how you arrived**
8 **at \$50 and not \$60 or \$40 for the ad pack price.**

9 A Well, I was just looking -- like, what I
10 was saying, if someone is on Facebook and they're
11 buying 20 clicks, okay, on Facebook, if you're going
12 to have 20 clicks on an ad, you are going to probably
13 spend more than \$60. So I wanted to create something
14 that is of greater value, give people maybe a little
15 bit more but help them save some money as well, and
16 then have the revenue sharing position as well.

17 **Q So one reference point you had was**
18 **Facebook?**

19 A Uh-huh.

20 **Q Did you have any others, other sites that**
21 **you thought of when you were setting that price?**

22 A No. Just mostly Facebook or Google with a
23 pay-per-click project.

24 **Q Do you know what Google charges?**

25 A It really depends on your keyword. But it

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1 a sharing position, because I wanted to increase
2 those sales.

3 MR. FROST: Did that work?

4 THE WITNESS: It didn't. Didn't seem like
5 it. Because what you saw in the e-mail, we
6 definitely sold more of the ad packs than we have of
7 other services.

8 MR. FROST: If I'm just looking at it as
9 someone looking at the value as far as what you're
10 charging, to me it looks like there's \$10 worth of
11 services that you're buying, and then there's \$40
12 that is what you pay extra in the ad pack. I don't
13 know what that extra \$40 would be for.

14 THE WITNESS: Well, as I've explained twice
15 now, the service when you're buying it elsewhere is
16 more expensive anyway. So when you're saying that
17 you're paying for five or ten dollars' worth of
18 service, you're actually getting \$60 worth of service
19 for \$50 with the ad pack, if that makes sense.

20 MR. FROST: So you're saying you're getting
21 \$60 worth of services for \$50?

22 THE WITNESS: If you're to go to Facebook,
23 yeah. I mean, if you're paying three dollars per
24 click and you get 20 clicks, 20 times 3 is \$60. So
25 that's why I say that you're actually getting a

1 pretty good discount.
 2 And I believe that people are probably
 3 looking at and saying -- you know, just like if
 4 you're going to buy -- like what I mentioned before
 5 in e-mail, if you're going to sign up and have
 6 rewards with buying a certain kind of airline ticket
 7 versus another, why would someone buy on a card that
 8 they're going to have to pay interest rates on versus
 9 just buying the ticket straight flat? And it's
 10 because they're getting a benefit from that. So with
 11 the ad pack, I can imagine that people might have
 12 wanted to purchase it not just for the service but
 13 for the ability then to click through the traffic
 14 exchange and share in the revenue.

15 BY MS. OKINAKA:

16 **Q But Facebook has a higher Alexa ranking**
 17 **than Traffic Monsoon, right?**

18 A True. But a click is a click, and a click
 19 only comes if someone is interested in what you're
 20 offering. So the value of actually that kind of
 21 traffic is very high.

22 MR. FROST: So I think Alison asked
 23 earlier, but how did you settle on \$50? Is that the
 24 value of the services that you decided that would be
 25 worth, I mean, as opposed to \$60 or \$70?

1 THE WITNESS: I just was looking at what I
 2 was spending elsewhere and thought that 50 was a
 3 good, even, round number. That's what I selected and
 4 went with.

5 MR. FROST: Okay.

6 BY MS. OKINAKA:

7 **Q And I had a miscellaneous question, too,**
 8 **that came to mind during the break, which goes back a**
 9 **ways. So, you know, the paradigm I think of is like**
 10 **I look at the New York Times; I see an ad for the**
 11 **Gap. I click on it, and then I buy something from**
 12 **the Gap. And then the New York Times is paid, I**
 13 **guess, by the Gap -- or because I did that.**

14 But it doesn't sound like that's what is
 15 going on at Traffic Monsoon, that people are -- are
 16 they clicking a banner ad to buy a product and
 17 eventually buying a product, and then money comes
 18 back from that?

19 A Well, if you were to speak with the Gap,
 20 you'd probably find that not every single one of
 21 their clicks generates in a sale.

22 **Q Right.**

23 A So someone might click on the ad and take a
 24 look around the website and say, ah, that was nice; I
 25 took a look at some shoes and decided I don't want

1 the shoes. But the advertiser spent that money with
 2 the newspaper to have that banner ad on that website.

3 So that's exactly what Traffic Monsoon is
 4 doing is we are offering an advertising space that
 5 displays not only to people who are logging in and
 6 using our services, but it's also displaying to
 7 people like what I was explaining before, that on the
 8 rotators on that web -- either ad exposure page -- I
 9 think it's ad exposure -- the ad exposure page, all
 10 of those banner and text ads display there as well.
 11 So as I'm displaying that page throughout different
 12 surf exchanges and traffic exchanges, pay-to-click
 13 websites, then those people's ads are being displayed
 14 all out there.

15 So just like what you did, you saw an ad
 16 and said, hey, it's to the Gap. It had these --
 17 whatever it is you might have looked at on that ad
 18 and said, I think I want that. You click on it; you
 19 make a purchase.

20 That definitely is the same type of
 21 scenario with this type of advertising is that maybe
 22 someone is being offered an autoresponder service.
 23 And they say, you know what, I keep being told that I
 24 need an autoresponder service. I haven't gotten one
 25 yet. Let me take a look at it. Maybe they'll click

1 on it and say, you know what, I don't like this
 2 price. I've never heard of this company before. They
 3 might Google search it.

4 But all of the advertising on Traffic
 5 Monsoon is displaying in front of real people, and
 6 each real person has that same decision whether they
 7 want it or whether they don't want it, whether
 8 they're going to look for it later, Google search
 9 later. Whatever it is that they're going to do with
 10 it, they're real people. So there's the real reach
 11 of reaching somebody who's going to view whatever
 12 that ad is and visit whatever that website is.

13 **Q I was wondering, say, like in your example,**
 14 **say they look at the autoresponder and they do buy**
 15 **it. Does extra revenue flow to Traffic Monsoon from**
 16 **that?**

17 A No. And same thing is the way with the Gap
 18 as well.

19 **Q Okay.**

20 A If the Gap is buying advertising on the
 21 newspaper, they're probably paying per click or
 22 displays. Usually -- those are the two ways that
 23 advertisers usually are paying for advertising. It's
 24 not based upon whether a sale is generated. An
 25 advertising company could never guarantee sales.

1 **Q** Okay. Yeah, I get it.
 2 **So let me show you Exhibit 6.**
 3 A Okay.
 4 **Q** It's an e-mail you forwarded -- sent to us.
 5 **It contains an e-mail that you sent to Kenin --**
 6 **Spivak?**
 7 A Yes, that's right.
 8 **Q** And in the middle of the second page, here
 9 **is where -- it appears that you talk about where the**
 10 **\$50 that is paid goes.**
 11 A And any service, except for the cash links.
 12 **Q** Okay. And what happens with the cash
 13 **links?**
 14 A It's equally divided up.
 15 **Q** Oh. Yeah, right. Okay.
 16 A So that revenue just -- nothing happens to
 17 it other than it's paid out to the people who are
 18 clicking on the referral -- or the sponsor, I should
 19 say.
 20 **Q** I guess one question I had first, too, was
 21 **the \$50 for the payment of ad packs, where do they**
 22 **physically go? Like, I have my Paypal --**
 23 A Like, where does the money physically go?
 24 **Q** Yeah.
 25 A All right. So if you are using PayPal and

1 **Q** So all the \$50 coming in to buy ad packs
 2 **are aggregated in the Traffic Monsoon account?**
 3 **They've gone from the individual's PayPal account to**
 4 **Traffic Monsoon?**
 5 A Or the five dollars, the one dollars for
 6 cash links or the five dollars for Monsoon Traffic
 7 text ads. All of the money from every purchase is
 8 then sent to the Traffic Monsoon account, right.
 9 **Q** Okay.
 10 **So this Exhibit 6 talks about the**
 11 **disposition of the \$50 payment. It looks like 10**
 12 **percent, or five dollars, goes to the referring**
 13 **person. We talked about that.**
 14 A Uh-huh.
 15 **Q** 4.5 percent, or \$2.25, to Traffic Monsoon.
 16 **What is that used for?**
 17 A Well, when I first started Traffic Monsoon,
 18 I had no idea how big this was going to get. This
 19 used to be 15 percent.
 20 **Q** Oh, the money that goes to Traffic Monsoon?
 21 A It was going to be my income. Because I
 22 thought we would just maybe have a few hundred
 23 customers that would be regularly using the services.
 24 Because a lot of traffic exchanges only have about
 25 1,000 to 2,000 active users. So I thought, okay,

1 you have \$50 in PayPal, when you make that purchase
 2 it goes into Traffic Monsoon's PayPal account.
 3 **Q** Okay. And at PayPal, when you were using
 4 **PayPal, all the people who have bought ad packs, all**
 5 **their \$50 is there together. Is that right?**
 6 A (The witness nods his head.)
 7 **Q** But -- is that right?
 8 A Yeah, along with all of the service
 9 purchases, -- all of the services, regardless of
 10 whatever it is, yes.
 11 **Q** Okay. But does PayPal have a separate
 12 **account, subaccount for each person?**
 13 A For each person?
 14 **Q** For each purchaser. Like, if you do -- if
 15 **all four of us have bought ad packs and our money is**
 16 **at PayPal, does PayPal have a -- do they have a**
 17 **subaccount for me and for Scott?**
 18 A Well, to use PayPal you'd have to sign up
 19 and have an account.
 20 **Q** Okay.
 21 A And so then you'd be making a purchase from
 22 your account. So then when you make a purchase from
 23 your account, the money from your account then goes
 24 to the Traffic Monsoon account for that service
 25 purchase.

1 this will be my income, and this is how I'm going to
 2 afford the cost of the site and the hosting and
 3 advertising all these different things plus paying my
 4 rent. I lived in a one -- I still do live in a
 5 one-bedroom apartment there.
 6 So I thought, you know what, this is how
 7 it's going to work. I'm going to just support myself
 8 this way, support the business, and that was what I
 9 was going to do. And then as sales were raising up
 10 more and more, I said, you know what, this is too
 11 much for me. So I dropped it down to 4.5 percent.
 12 **Q** Okay. So this is used for all the company
 13 **expenses and your living expenses --**
 14 A Right.
 15 **Q** -- whatever it amounts to. Okay. 1.5
 16 **percent, or 75 cents, I think, to the programmer,**
 17 **Alex?**
 18 A Uh-huh, that's right. 1.5 percent, uh-huh.
 19 **Q** 79 percent, or \$39.50, to the reserve fund,
 20 **which we can talk about; and 5 percent, or 2.50, to**
 21 **be shared as revenue after 24 hours?**
 22 A Right. So when you add together all of the
 23 percentages, that money that comes in for the
 24 purchase gets divided up, and there's -- it's all
 25 accounted for. There's not more shared out than what

1 actually exists or anything like that. No more
2 commissions rewarded, so it's fully accounted for.

3 MR. FROST: Do you have different accounts
4 that that goes into, or how do you designate that?

5 THE WITNESS: Well, it's designated within
6 the software of my website. So it's within the
7 database. So the cash values that are showing in --
8 so that five dollars that's now awarded as a
9 commission or 25 cents, whatever the commission is,
10 it's whatever the purchase was. Like, if it was the
11 traffic exchange credits for \$5.95, that 59 cents
12 that's now held over here is backed up inside of
13 PayPal for the purchase that someone originally made.
14 If that makes sense.

15 BY MS. OKINAKA:

16 **Q I think I may have missed that.**

17 A So it's owned by the traffic exchange
18 credits for \$5.95. 10 percent of that is 59-1/2
19 cents. So that 59-1/2 cents goes on the sponsor's
20 account inside of my own website software. So the
21 money is accounted for, but it's being held inside of
22 PayPal.

23 So the real value is -- even though in our
24 system it's not PayPal, the figures itself are fully
25 accounted for as being real money that's actually

1 **those reserves" on this day that you're speaking**
2 **about. And I just wondered, how did you arrive at 73**
3 **percent?**

4 A Well, what it is is the system will never
5 reward more than what is actually there.

6 **Q Right.**

7 A But what it will also do is just make sure
8 to keep some in savings. And so that's just how it
9 is explained here. I'd have to really see if I can
10 find an algorithm for that, because it's something
11 that my programmer has kind of put together. But
12 it's something that essentially, like I said, only
13 real revenue is shared.

14 **Q Right.**

15 A So it's put together in a way to help keep
16 things -- you know, so that members, they've got the
17 up and down because sales are up and down. And it
18 also keeps it so that we can have an amount that's
19 built up in reserve in case we have any fraud,
20 chargebacks. So that's just what all that is there.

21 **Q Right. So I see, don't pay out more than**
22 **100 percent.**

23 A Right.

24 **Q But it sounds like it's not set at we're**
25 **always going to pay out 70 percent, that it can**

1 inside of PayPal.

2 **Q And you share revenue every hour?**

3 A That's right.

4 **Q And how do you -- so do you review revenue**
5 **every hour yourself? Do you look at it?**

6 A Oh, no way.

7 **Q I wondered that.**

8 A It's done by the system. So the system,
9 what it does is it catches a total of whatever the
10 revenue is from 24 hours ago. And since 5 percent of
11 it was already put aside to be shared in 24 hours,
12 then whatever that amount was from that hour, it gets
13 shared the next day.

14 **Q So you've already got 5 percent put aside.**
15 **How do you know -- how much of the reserve -- I know**
16 **the reserve gets used.**

17 A Uh-huh.

18 **Q But how do you decide how much -- on any**
19 **given day or hour how much the reserve will kick in?**

20 A It's -- it's a good question.

21 **Q Because here, like, in your example in this**
22 **Exhibit 6, on the third page you talk about the**
23 **revenue sharing, then you say "Then, the reserve pool**
24 **is utilized." And in your example, "the system will**
25 **spread out sharing each hour around 73 percent of**

1 **change from day to day depending on how sales are. So**
2 **I was just wondering how -- sounds like that's**
3 **programmed into the system in some way. Is that**
4 **right?**

5 A It is. It is. But I'll have to dig into
6 exactly how it is worded that way. But it is pretty
7 consistent when it comes to the percentages, because
8 the end users, they do see the up and down based upon
9 the sales. I mean, if you were sharing the revenue,
10 you'd see some days it's more or less. I see people
11 talking about that in forums and groups saying, wow,
12 today was an especially good day. We must have had a
13 large amount of sales yesterday.

14 **Q So there's still some up and down, but the**
15 **reserve helps to smooth it out a little bit?**

16 A Right. Because what I recognize, one of
17 the things with AdHitProfits is when there's dramatic
18 ups or downs, it causes people to have a fear that
19 the company is dying or dead or something. So
20 there's that extra buffer built in to help, you know,
21 for the weekend or for any other day that there might
22 be a sale drop; then we can just say, you know what,
23 we've got some extra revenues from this other day;
24 we'll just share it out here. So that's basically
25 how it works.

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1 **Q Do the members or advertisers know that you**
2 **do that?**

3 A No.

4 **Q Have you thought about telling them?**

5 A I don't want to, because what that would do
6 is cause more people to copy my business model. And I
7 would rather them just know that we are only sharing
8 revenues that have been generated 24 hours or more
9 ago.

10 MR. FROST: So when you share the revenues
11 and go into the reserves, it doesn't necessarily mean
12 the reserves just came from the last 24 hours; it
13 could have been 48 or a week ago?

14 THE WITNESS: It's a combination of the
15 amount of savings that have come from all of the
16 sales since we started.

17 MR. FROST: Okay. So all of that is
18 available to be paid in terms of the reserves if you
19 want to.

20 THE WITNESS: Oh, and I definitely do.
21 There's no reason in the world for me to keep that
22 kind of money. It's just too much for me.

23 BY MS. OKINAKA:

24 **Q So when you talk about Traffic Monsoon's**
25 **revenue, that includes a lot of things, and one of**

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1 those. So the money that's coming in from those
2 advertisement sales we couldn't put anywhere else
3 because they're already being paid out to the
4 clickers.

5 **Q So we talked, I guess, about the \$50 coming**
6 **in, and now to go on about how the revenue is shared.**
7 **So in order to -- you have to click to share in -- to**
8 **be part of the revenue sharing, right?**

9 A That's right. So an ad pack buyer, they
10 receive a service, but if they want to share in
11 revenue, they need to click on at least ten ads in
12 the traffic exchange in that day.

13 **Q And is that regardless of how many ad packs**
14 **they bought?**

15 A That's right, regardless.

16 **Q And when you talk about -- in your**
17 **materials here about active members, are you -- does**
18 **that -- what does that refer to?**

19 A Well, let me see if I have it on the
20 website. I think I did put it somewhere. Okay. I
21 think on the ad plans page -- okay. Where it says
22 "earn traffic exchange credits," it says "any
23 purchase turns your account into a lifetime paid
24 member." So in our software it's going to show unpaid
25 or active. So active means that they've made a

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1 **the things it includes is the \$50 -- \$50 paid if you**
2 **buy an ad pack. Is that right?**

3 A So people that are buying ad packs, right.
4 You're saying that money goes into PayPal or the
5 different payment processes?

6 **Q Well, like when you speak about revenue,**
7 **revenue to Traffic Monsoon like we've been saying,**
8 **does that include the \$50 that comes in when you buy**
9 **an ad pack?**

10 A Right. Let's go over to the ad plans page.
11 I think that's in maybe the fourth exhibit. Yup,
12 Exhibit 4 where it talks about on page 3 the
13 services. I didn't realize that the ad pack wasn't
14 listed on that list, but it should be because the
15 revenue is shared from all of the services that are
16 purchased on the website except for the cash links.

17 **Q So we're looking at Exhibit 4, page 3 of 7.**

18 A Trying to think -- I remember putting it
19 somewhere.

20 **Q Maybe that's why I'm confused. But anyhow,**
21 **it should be there?**

22 A Yeah. So the revenue is shared from any
23 advertising purchase except for the cash links.

24 **Q Okay.**

25 A The cash links, people are clicking on

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1 purchase of something.

2 **Q At some point.**

3 A At some point. But it doesn't necessarily
4 have any bearing on -- that's just within our
5 software.

6 **Q Okay. Because I thought at first it meant**
7 **that you on a given day had clicked ten times. But**
8 **it's --**

9 A So that would be qualified, yeah.

10 **Q Okay. So on any given day, to share in**
11 **revenue does the member have to do the ten clicks?**

12 A They do. They would.

13 **Q So I might click ten times on Monday and**
14 **Tuesday and then skip Wednesday, and for each of**
15 **those days I might not -- I might not share in**
16 **revenue on any day when I didn't do the ten clicks?**

17 A Right. Whatever revenue there was we'll
18 share with you when you're qualified. And if you're
19 not qualified, then you don't get anything on that
20 day.

21 **Q Have you ever had your system crash --**

22 A Yeah.

23 **Q -- for Traffic Monsoon?**

24 A Yeah, just too much traffic coming through.
25 So it's had -- it's had a crash, you know, when the

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1 website was unreachable, and contact Snook saying,
2 hey, what's going on? They say, your server has
3 crashed. And they've had to reboot it and get it
4 started back up, and then the traffic can start
5 flowing back through.

6 **Q Because it's keeping track of all this data**
7 **that relates to the money, you know, and everything?**

8 A Every single thing, yup.

9 **Q But you haven't lost your data ever, right?**

10 A Well, there was -- we have data backed up
11 every 24 hours. So if it does get lost, then we at
12 least have a 24-hour -- at least some time within the
13 last 24 hours a vantage point to go from. Let me
14 see. There was -- what month was that? Sometime
15 last year -- I want to say it was either March,
16 April, or May of last year that happened, and so we
17 lost some time.

18 So what I did is I had my programmer build
19 into the script a way -- because within PayPal you
20 can download transaction history. And so I took the
21 transaction history and uploaded it into Traffic
22 Monsoon, and any account that didn't exist, I just
23 hit refund on those transactions. So people that
24 made purchases for service because the data wasn't
25 there, I made sure to get them a refund for the

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1 that bar. So that's like an ad frame is what it's
2 called.

3 **Q So the website below it, is that that**
4 **person's website?**

5 A Uh-huh.

6 **Q Okay. Yes?**

7 A So it's a different -- just to clarify: if
8 you're clicking through, it's built into the software
9 that no one would see their own website as they're
10 surfing, ever. So it's on a rotation. So when
11 people are surfing through that rotation, they are
12 automatically never going to see their own website,
13 ever.

14 **Q So then the counter counts down 20 seconds,**
15 **and then what happens?**

16 A And then it has shapes to match, just to
17 confirm that you're a real person. You match up the
18 shape, and then it goes to the next page.

19 **Q And does the system -- it never shows you**
20 **your own web page, but does it pick a web page for**
21 **you?**

22 A Yeah, every single time.

23 **Q Okay.**

24 A Uh-huh.

25 MR. FROST: So you really don't have to

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1 services that they didn't receive, because their
2 account now wasn't there. Their ad that they set up
3 wasn't there.

4 **Q Oh, okay.**

5 A So the message was then sent out of what
6 had happened, and I think it's in the site news. I
7 don't know if it's still there. But it explained
8 what had happened and that we've been refunding
9 everybody that didn't receive their service purchase.

10 **Q So when the member goes to do his ten**
11 **clicks, do banner ads appear on his dashboard for him**
12 **to click on?**

13 A Well, what it is is when someone clicks on
14 the traffic exchange and they click that start
15 surfing button --

16 **Q Right.**

17 A -- a window opens up. On the top of the
18 window is a countdown timer that starts at 20
19 seconds. Then it has the picture of the person whose
20 website you're looking at and also a banner. And the
21 banner is just an ad bar. You don't have to click on
22 it, but it's in front of your eyes, so that as you're
23 surfing you are seeing other people's banners, but
24 that's not what you're getting rewarded for clicking
25 on. It's the website that you're viewing down below

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1 surf; it does it for you. So it makes it a little
2 easier.

3 THE WITNESS: Well, it is a manual surf.

4 There's two different types of traffic exchanges. One
5 is manual; the other is auto.

6 Manual is you do have to physically be
7 there, confirm you're really there by matching shapes
8 or something and hit the next website. Just like on
9 this Traffic Monsoon, you have to click to go to the
10 next site. So you are viewing the next page, you are
11 surfing; but with automatic it just has a countdown
12 timer, and then no one really has to be there at all.

13 MR. FROST: Oh.

14 THE WITNESS: And so no one's being
15 confirmed whether they're a real surfer or not. But
16 with Traffic Monsoon we've got the confirmation that
17 you're really there, and also something called
18 in-focus surfing as well, which means that if you
19 were to tab out of the ad while it's having the
20 countdown timer, if you decided to check out what's
21 on Facebook or something, that countdown timer stops,
22 so you have to keep that page open to receive the
23 credit for that view. That's one of the ways that
24 we've actually been able to catch bots and stop bots
25 from working, because by requiring that in-focus,

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1 it's caused those bot software not to work so well.

2 So --

3 BY MS. OKINAKA:

4 **Q And then can members use like auto click**
5 **programs that will do these things, or does that get**
6 **defeated by the requirement that you match the**
7 **shapes?**

8 A Hopefully it gets defeated by that as well
9 as that in-focus surfing. And it's -- if we -- every
10 now and then someone sends us a screen shot of maybe
11 some software someone is using, and we have done our
12 best to stop it from being effective within the site.
13 There might be something lurking out there, but we
14 don't know right now. From what I'm looking at, I
15 think we've got them beat pretty well.

16 **Q So I've clicked my ten times now, and I'm**
17 **going to share today in company profits until what**
18 **you call my bucket gets to \$55 eventually?**

19 A So you qualify to receive the share of the
20 site revenue, right. And then your sharing position
21 does have a maximum -- it doesn't just last forever.
22 But yeah, it's got a maximum of \$55 that you would
23 ever be able to receive towards that position.

24 **Q Did you determine that it would be 55?**

25 A Yes, I did.

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1 **Q And what did you -- how did you come up**
2 **with that?**

3 A I didn't want it to be too much more than
4 what someone had spent, but I did want to make it --
5 I don't know. I just felt that I didn't want it to
6 be too much, either, because that would cause
7 revenues to run out faster. So I just thought, you
8 know, 55 seems to be decent.

9 **Q Has it been 55 since Traffic Monsoon**
10 **started?**

11 A Yes. It's never changed.

12 **Q And if I go along and on some days I don't**
13 **qualify, I don't click ten times, will I still**
14 **eventually --**

15 A The fill line doesn't change, if that's
16 what you're asking. It stays at the 55 as the max.
17 So if you didn't qualify for sharing today, well,
18 then if you qualify tomorrow, then whatever revenue
19 that we have to share with you you'd receive. And it
20 would continue to share up until that max. As long
21 as we have sales of the services and as long as you
22 qualify, you'll continue to receive the share of the
23 revenue.

24 **Q It still stays alive, no matter -- does it**
25 **stay alive no matter how long it takes me?**

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1 A No matter how long. There's no time frame
2 with this whatsoever.

3 MR. FROST: If you're a qualified member,
4 does that change every day based on whether you do
5 the ten clicks?

6 THE WITNESS: That's right. So if you
7 qualified today, you wouldn't be qualified tomorrow
8 until you actually click at least the ten ads. So
9 when someone's logged in on their dashboard, it shows
10 them how much longer they're qualified. So if they
11 want, they can do their ten clicks as a minimum
12 before the timer runs out. Or if it runs out, then
13 they're just not going to be qualified for however
14 long it is until they click at least ten again.

15 BY MS. OKINAKA:

16 **Q Do you know whether most people are just**
17 **doing the minimum ten, or how many are doing more?**

18 A No, I don't.

19 **Q You wouldn't be able to see that?**

20 A I can maybe check with my programmer if he
21 has a way to discover that.

22 MR. FROST: I think what would be
23 interesting is to know how many qualified people you
24 have every day, you know, just as an average. Do you
25 have any idea?

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1 THE WITNESS: No. But I could look that
2 up. I could get my programmer to pull that report.

3 MR. FROST: Because how many ad packs is
4 going to be a lot more than the number of qualified
5 people.

6 THE WITNESS: Right. Right. I mean, I do
7 have a page inside of my administration panel that
8 shows me how many of those positions are qualified,
9 how many people -- because when people buy an ad
10 pack, that's a service. So the ad pack is not
11 qualifying. The member is qualifying to receive
12 towards a sharing position. And so the number of
13 qualified positions, there is a place within my back
14 office to show me that, and that definitely varies
15 every single day.

16 MR. FROST: Okay. Well, we'd like at least
17 a few numbers, maybe for February 10th and --

18 THE WITNESS: I don't have a historical
19 view on that.

20 MR. FROST: Oh, okay.

21 THE WITNESS: But I can tell you today's or
22 this hour's, because it varies hour to hour. Because
23 if you're qualified let's say for 24 hours, then in
24 24 hours from now you're no longer qualified. So
25 there's other people varying at different times and

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1 hours and minutes of every single day. So from one
2 minute to another minute, the number is going to
3 fluctuate.

4 MR. FROST: What was the last number you
5 remember seeing?

6 THE WITNESS: I'm terrible when it comes to
7 remembering things, honestly. I would have to really
8 look at it to be sure.

9 MR. FROST: Okay.

10 THE WITNESS: I could give you a screen
11 shot if that helps, but --

12 MR. FROST: Yeah, that would be fair.

13 THE WITNESS: Sure.

14 BY MS. OKINAKA:

15 **Q So as you said, there's no guaranteed**
16 **length of time till I get my 55 in my bucket. But --**
17 **so some time goes by, and I've gotten to 55. And the**
18 **revenue -- that's a share of revenue from the sale of**
19 **all the services except cash links sales, right?**

20 A Uh-huh, that's right.

21 **Q So now I've gotten to 55, and I can ask for**
22 **that money to be paid to me?**

23 A Uh-huh.

24 **Q And I would get, I guess, 55 minus whatever**
25 **fee PayPal or the processor decided to impose?**

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1 A That's right. If it was PayPal, there
2 would be a 2 percent fee, because that's what PayPal
3 charges me to send someone through mass pay. But
4 with SolidTrustPay and Payza, I'm not charged
5 anything for sending people. So I don't charge any
6 fee on those, and then the fee then is maybe whatever
7 they get on the processor's side, because processors
8 would then charge the fee to them whenever they
9 receive money.

10 **Q So when a member's bucket gets to \$55, what**
11 **happens, you know, if I don't notify you that I want**
12 **to withdraw? Does it stay in my account at PayPal?**

13 A Well, it's your --

14 **Q How does it work?**

15 A It would be inside of your Traffic Monsoon
16 account. Your account management is completely up to
17 you. I've never forced anyone to do anything with
18 their money. It's theirs. So if you decided just to
19 sit there, it would just sit there.

20 **Q So it would sit there unless I asked for**
21 **it?**

22 A Unless you asked for it or unless you
23 decide to use it to make a purchase.

24 **Q Okay.**

25 A But it's completely up to you, whatever it

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1 is that you want to do.

2 **Q Does the system notify me, I guess, when I**
3 **get to 55?**

4 A No. But if you're logging in every single
5 day, you'll see what your balance is.

6 **Q Do I see -- if I own multiple ad packs, do**
7 **I see a progress report on each one?**

8 A You can. There's a menu option inside the
9 member area, whether it's the open or the closed
10 sharing positions. So you can kind of track the
11 progress of where you are towards each one.

12 **Q So do you call it a closed revenue sharing**
13 **position when you reach 55?**

14 A That's right.

15 **Q Okay.**

16 A I just remembered, you're asking about how
17 many active positions there are?

18 MR. FROST: Qualified, yes.

19 THE WITNESS: Oh, qualified. Oh.

20 BY MS. OKINAKA:

21 **Q Yeah, active. Once active, it's always**
22 **active.**

23 A Because I was just remembering that e-mail
24 that I sent just yesterday, and it had the number of
25 active, but I don't remember if it had the number of

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1 qualified. But I'll get that for you anyway.

2 MR. FROST: Okay. Because we were trying
3 to see how many qualified people would be clicking
4 each day, because then that would tell us how many
5 clicks are coming to your website that are
6 attributable to your members, wouldn't it?

7 THE WITNESS: Okay. So you're wanting to
8 see how many clicks are coming from inside of Traffic
9 Monsoon versus outside?

10 MR. FROST: Well, not even versus outside.
11 Just how many clicks are coming from members inside
12 Traffic Monsoon.

13 MS. OKINAKA: Who are qualified.

14 MR. FROST: And I thought if we looked at
15 the qualified members, then they must have clicked
16 ten times; otherwise, they wouldn't have qualified.
17 So we could determine how many clicks were coming
18 based on that.

19 THE WITNESS: That's assuming that
20 everyone's clicking only ten. There's probably a
21 number of people that click more than ten. So what I
22 could do is I could get that information for you.

23 Because the number of positions, that's not the
24 number of people. So you'd want number of people.

25 MR. FROST: Right.

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1 THE WITNESS: Okay.

2 MR. FROST: I mean, does that make sense?

3 THE WITNESS: It does. If you can e-mail
4 me those things just to jog my memory, because I'm
5 terrible at remembering, like I said, then I'll make
6 sure to get that over to my programmer with those
7 specifics. And we can kind of keep a gauge on that
8 for you, because there wouldn't be any history going
9 back because we haven't been saving that information.

10 Then we can then forward -- I could even
11 get my -- ask my programmer to create a link to send
12 to you so that each day that you click on the link or
13 anytime you want to click on the link, it will show
14 you the live statistics for you to kind of just gauge
15 yourself if you want to.

16 MR. FROST: Sure, if you're able to do
17 that.

18 THE WITNESS: Yeah, absolutely.

19 BY MS. OKINAKA:

20 **Q We don't want to be in a position where we**
21 **could modify anything that --**

22 A Oh, you wouldn't be able to modify it, but
23 it would just report to you whatever the information
24 is that you want, yeah.

25 **Q Okay. So my -- so if I don't do anything**

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1 **with my \$55, does it go to buy an ad pack again?**

2 A No.

3 **Q If I don't tell you anything -- I would**
4 **have to tell you?**

5 A Right. Because that money is there in your
6 balance, and it stays there. Nothing happens. If you
7 don't do anything with it, it just stays there like
8 that.

9 **Q Okay.**

10 MR. FROST: Is there a mechanism in the
11 website that you can have it automatically be used to
12 make a purchase?

13 THE WITNESS: No. There have been some
14 people that have requested we do that. And I just
15 was afraid that if I did that, people might forget
16 that they had set it up, and then they might scream
17 that they've lost money. And I just said, you know,
18 instead of worrying about all this, and I didn't
19 cancel that or I did, or disputing whether someone
20 set it up or didn't set it up, I just said, you know
21 what, we're not even going to set that up. Don't
22 want that built in. Just figured that would be a
23 customer service headache.

24 BY MS. OKINAKA:

25 **Q Maybe so. So I'm sorry to keep asking**

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1 **about the ad packs. When they get the \$55, do they**
2 **more or less expire, or do they continue to earn?**

3 A They reach a max, so they wouldn't continue
4 after that point. It's a fill line, so it ends right
5 there. The neat thing just to note is that each
6 hour, like what was mentioned when you share the
7 revenue each hour based upon the sales 24 hours ago,
8 your balance is going to increase. So you don't have
9 to wait until your balance is at \$55. Your balance
10 will be, let's say this hour, five cents, or in the
11 next hour, four cents more, and then the next hour
12 maybe three cents, and then the next one six cents
13 more. You know what I'm saying? So you'll see that
14 fluctuation each hour, but your balance is going to
15 increase every hour. So you don't have to wait until
16 you reach \$55 to cash out.

17 The minimum is two dollars. So when your
18 balance reaches two dollars, you can make that
19 request to be sent to Payza, PayPal, or
20 SolidTrustPay. Some people ask, why two dollars?
21 It's because looking at the fees, it wouldn't be
22 worth going anything less than two dollars. And I
23 want to protect people from themselves. Because if
24 they request a one-cent withdrawal, they'll get
25 nothing because the fee will take it all.

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1 So I figured, let's just -- two dollars
2 seems to be a decent thing, plus it's a common
3 minimum. With like NeoBux, for example, it's two
4 dollars there, too.

5 MR. FROST: So if you get -- if you buy an
6 ad pack for \$50 and your bucket has filled to the
7 point where you've got \$50 in there, could you use
8 that and buy a new ad pack and then still continue to
9 earn revenue on the first ad pack?

10 THE WITNESS: That's right. Each sharing
11 position would continue to have that maximum of \$55,
12 no matter how many positions that you have. If you
13 buy more ad packs and you get more sharing positions,
14 then each position would always have a max of the 50.
15 But, like it says on the website, there's no
16 guarantee that they'll reach the max, but you'll be
17 able to continue to share in the revenue as long as
18 you've qualified.

19 BY MS. OKINAKA:

20 **Q So to date, has anybody's \$50 ad pack**
21 **purchase failed to get to 55 if they've left their**
22 **money in and not taken out two dollars?**

23 A What do you mean?

24 **Q Well, you're sharing revenue every hour. I**
25 **guess you've had revenue on every day --**

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1 A Yeah.
2 **Q -- correct? So eventually all the ad packs**
3 **would get to 55 unless the owner took money out. Is**
4 **that right?**

5 A Well, I guess what it means is, you know,
6 the sustainability of any business is basically
7 supply and demand. If I'm offering an advertising
8 service that people enjoy, if they like using the
9 services, then they'll come back and buy some more.
10 And right now we are ranked number one on at least
11 two traffic exchange rank sites. And that's based
12 upon their own criteria, not because of anything
13 else.

14 So if our services are in demand, hopefully
15 they stay that way, because then we'll continuously
16 have more people needing to purchase and repurchase
17 advertising services to build up their name, their
18 brand, whatever it is that they're trying to promote.
19 So as long as we can continuously offer advertising
20 service and deliver those services and people enjoy
21 those services, then those sales should continuously
22 happen. And as those sales of the services happen,
23 then we'll have that revenue then to share with
24 people who qualify.

25 **Q Do you have a sense of what's the longest**

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1 **it's taken for a member -- a qualified member to get**
2 **to 50 -- to reach the 55 fill line?**

3 A I really don't know. I've never tracked
4 it. There's nothing in the back office that shows
5 how much has been shared. I think I mentioned this.
6 It doesn't say how much has been shared per day.
7 There's no historical value there. It just shares
8 whatever -- spits it out. You know, whatever is
9 there goes.

10 But as far as each -- or each individual
11 sharing position, I don't know how long it takes.
12 There's people who tell me, oh, it took 45 days, or,
13 oh, it took 55 days. This one took 50 or 47. I just
14 hear it from them. I have no idea, because it's not
15 programmed in any way within the system, because it's
16 not time-based at all. But sometimes people just
17 talk about it and I hear it, but I have no idea.

18 MR. FROST: Except for the time that PayPal
19 closed the account because your site has been so
20 successful, you've been able to pay out that 55 every
21 time, then?

22 THE WITNESS: Well, I would say it really
23 depends on whether someone is qualified. And also,
24 like, I think -- what was it? -- in that report out
25 of all of the number of ad packs that people have

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1 purchased, about half of the sharing positions have
2 reached the max because they're still in progress of
3 sharing in the revenue. And some are put into
4 pending because of the whole PayPal situation.

5 So if you're asking, are there people that
6 haven't reached their max? Well, about half of the
7 people who have purchased it haven't reached their
8 max yet. But as they continuously click to qualify,
9 then they'll continuously share in whatever revenues
10 we have to share with them.

11 MR. FROST: So the qualified members or
12 qualified positions, they're -- they've always gotten
13 their 55, is that correct, other than the ones that
14 are pending right now?

15 THE WITNESS: I would say whatever amount
16 that they receive, it's when they're qualified.
17 Because to say that they've all received 55, it's
18 because -- obviously, there's some that haven't yet
19 because, like, they just purchased some yesterday or
20 they just purchased the ad packs three days ago, so
21 they haven't reached 55 yet.

22 So I just -- I'm trying to be exact, maybe.
23 Maybe a little too exact of what it is that you're
24 asking. Maybe I'm not sure of what exactly you're
25 asking.

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1 MR. FROST: Well, I guess I'm just
2 wondering if anyone through the history of Traffic
3 Monsoon has not been able to earn the \$55 return even
4 if they've been qualified, unless they are within the
5 time where it hasn't had a chance to earn the 55.

6 THE WITNESS: What I would probably say,
7 then, is that it's not a return.

8 MR. FROST: I'm sorry. I don't mean to say
9 "return."

10 THE WITNESS: It's all right. And the only
11 reason why I stopped there for that is sometimes I
12 hear members use those words, and I always stop them
13 and say, I want you guys to realize this is not an
14 investment; this is not a return. You're not getting
15 your money back. You have purchased a service and
16 have received that service, and now you're clicking
17 to qualify to share in the revenue. So I always --
18 whenever I hear that, it's, like, programmed now.
19 It's just a habit.

20 So when people are qualified, they would
21 share in whatever revenues there are. And then
22 they'll continue to share up to 55, which means if
23 that revenue -- and since it has been coming in, no
24 one stops early. As long as they are qualified, it
25 always has been reaching the 55. Is that what you're

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1 asking?

2 MR. FROST: Yes.

3 THE WITNESS: Is that people in the past,
4 it doesn't stop early. That's always been the
5 maximum.

6 MR. FROST: Okay. That's essentially what
7 I was asking.

8 THE WITNESS: Okay.

9 BY MS. OKINAKA:

10 **Q So I've earned -- I've gotten to 55, and I**
11 **decide I want to use that to buy more ad packs. And**
12 **I forget how you -- it's in my -- it's still at**
13 **Traffic Monsoon, but it's sort of in my account. I**
14 **now show 55 that I've earned. And if I -- what do I**
15 **do if I want to use that to buy an ad pack?**

16 A If you want to use the money in your
17 balance --

18 **Q In my balance, right.**

19 A -- to make the purchase? So that balance
20 is, of course, displaying a figure to you that's
21 being held by Traffic Monsoon for you.

22 **Q Yup, yup.**

23 A And that money, let's say, is inside of
24 PayPal. So that money, if you were to click on the
25 withdrawal button, that \$50 would be then sent to

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1 commissions and all of that, just like how we spoke
2 of that before.

3 **Q So when I buy my second ad pack that way**
4 **using my account balance, that's revenue to Traffic**
5 **Monsoon, and just divide it up?**

6 A So it is counted as revenue because you've
7 made that purchase. Because otherwise -- because it
8 is your money. It's not Traffic Monsoon's money.
9 You're using your money to make a purchase with it,
10 so it is counted within the system as being revenue
11 that's being generated.

12 **Q So are you not double counting my \$50?**

13 A No, because it's counted as yours.

14 **Q Because I could take it out?**

15 A Right. If you're looking at a balance
16 sheet, it would be zero is with Traffic Monsoon and
17 50 is with you. And then when you spend the 50, now
18 you've got zero, and then it breaks down the
19 percentages of that purchase into dividing up where
20 it goes. So it's all fully accounted for. Does that
21 answer your question?

22 **Q Well, you know, what I was wondering --**
23 **okay. So at the very outset, I have my \$50 and I buy**
24 **an ad pack. And time goes by and I have 55, and I**
25 **use that to buy ad pack No. 2, but I haven't spent**

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1 your PayPal.

2 But if you decide to use that \$50 to make a
3 purchase, then that money then is going to show a
4 zero balance for you on your account because now
5 you've spent the \$50. Or I guess if you had 55,
6 you'd have a balance of five dollars now, right?

7 **Q Yeah.**

8 A And then you could use that five dollars
9 however you want -- withdraw it, whatever you want to
10 do. But if you've decided to make a purchase, it
11 would be the same purchase pays that you'd make the
12 first time.

13 **Q Okay.**

14 A Click on the banner page. You click on buy
15 ad pack. You'd select one ad pack that you want to
16 purchase. It gives you a breakdown, and then you can
17 select the payment processor. The first option is
18 now you can use your account balance. So it's got
19 balance, Payza --

20 **Q And I don't need a payment processor.**

21 A So you don't need a payment processor
22 because the money is inside the payment processor
23 already from within your balance in your account. And
24 then it's now subtracted from your account balance,
25 and then that money is then divided up as 10 percent

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1 **\$100. I have two ad packs, but I didn't spend \$100,**
2 **I only spent 50. So it almost seems like -- do you**
3 **know what I mean? -- like you're counting my \$50**
4 **twice.**

5 A So you're saying that you have qualified,
6 you've shared in revenue. You have received money
7 your own self on your account up to \$55, and I've got
8 a \$55 balance. And that 55, you want to use 50 of it
9 to buy another ad pack. Is that right?

10 **Q Yup.**

11 A So I'm not double counting it because I've
12 shared revenue with you. And now you have actual
13 real money in your account. It's fully backed up
14 inside of the payroll processor. The money in the
15 payment processor is not moving, though, because it's
16 not going to your account and then back, because
17 there would be a fee there, wouldn't there?

18 **Q Yeah, yeah.**

19 A So what you're now saying is you want to
20 use that money to make a purchase, which it is real
21 money. You could hit the withdrawal button, and you
22 can get it in your payment processor. And then if
23 you wanted to, you could use that to make a purchase,
24 but then you'd be covering a fee. So instead of
25 paying a fee -- you're saving yourself a fee by using

1 your account balances, actually.

2 **Q Yeah.**

3 A But the money is really there. Then, like
4 if you're looking at the accounting side, like if you
5 balance a checkbook, that \$50 is on your side, and
6 now it's on the company side.

7 **Q Uh-huh.**

8 A The money is still inside of PayPal or
9 Payza or SolidTrustPay or whatever. So the money
10 itself physically hasn't moved, but within our own
11 system it's being accounted not as being attributed
12 towards you anymore, but it's now being counted as a
13 purchase through the system.

14 **Q Well, so I think I'm clear on how it works.**

15 A Okay.

16 **Q I understand that. And I guess it's**
17 **just -- I have a question about -- my question is**
18 **sort of about characterization of it. But I think --**
19 **I see how it works, though. That's kind of how I**
20 **thought it worked.**

21 A Okay.

22 **Q Okay, we have a couple more exhibits to**
23 **show you. Are you guys okay?**

24 A Uh-huh.

25 **Q What's your parking lot --**

1 A 2:28.

2 **Q Well, let us know if we forget when you get**
3 **close to that --**

4 A Okay.

5 **Q -- since you're looking at the clock.**
6 **(SEC Exhibit Nos. 7 and 8**
7 **were marked for**
8 **identification.)**

9 **Q So we're showing you Exhibits 7 and 8**
10 **together.**

11 A Okay.

12 **Q And they're both very short spreadsheets.**
13 **And No. 8 is actually -- if you recognize it, it's**
14 **from an e-mail you sent us.**

15 A Okay.

16 **Q Does that look familiar to you? We just**
17 **put it into a table form.**

18 A It does look familiar. But No. 7 --

19 **Q And No. 7 is an exhibit that was created**
20 **from the first large data that you sent us. So you**
21 **haven't seen 7 before?**

22 A Right.

23 **Q And we try to sort out the largest, sort it**
24 **by category and just show the largest line items**
25 **there.**

1 MR. FROST: Our understanding of Exhibit 7
2 is that it shows the cash in. Is that accurate, do
3 you know? This was made from the first set of data
4 that you sent to us.

5 BY MS. OKINAKA:

6 **Q At the end of April.**

7 A Okay.

8 **Q Does it show cash in?**

9 A No, it does not. It shows just the changes
10 of account balances.

11 MR. FROST: What would that mean? Let's
12 look at the first line item, ad pack pool,
13 145,309,319. What does that mean? What does that
14 tell us?

15 THE WITNESS: So this is something that
16 you've created; is that right?

17 MR. FROST: We just added together all of
18 the lines that said "ad pack pool" and put them into
19 a total.

20 THE WITNESS: Okay.

21 BY MS. OKINAKA:

22 **Q In the first set of data -- from the first**
23 **set of data you sent us.**

24 A Okay. You're talking about the full file.
25 So the second one, okay.

1 **Q I think there was -- was it the first?**

2 MR. FROST: If this is -- if you don't
3 think this is accurate, we don't need to reference
4 No. 7.

5 THE WITNESS: I just have never seen it, so
6 I wasn't familiar. But this is -- so you're saying
7 that what you did is you took from that large
8 database record and you combined together all of the
9 ad pack pools?

10 MR. FROST: Correct.

11 THE WITNESS: All of the sponsored bonuses?
12 Okay, all right. Since I've never done that before,
13 I can't verify whether this is accurate or not, but
14 I'll assume that is.

15 MR. FROST: Well, we don't have to use it,
16 because I don't want you to say that these numbers
17 are accurate when you have no basis for saying that.

18 So let's just look at No. 8.

19 THE WITNESS: Okay.

20 MR. FROST: And what can you tell us about
21 this? What do these numbers -- what time period do
22 they cover?

23 THE WITNESS: So this No. 8, I believe, if
24 this is in that first file, this is total as of that
25 date that I sent you this.

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1 MR. FROST: Okay.
 2 THE WITNESS: From the very beginning until
 3 that date.
 4 MR. FROST: All right. And the first row
 5 is banner ad package combo.
 6 THE WITNESS: That's right.
 7 MR. FROST: And it's 738 million. What
 8 does that number reflect?
 9 THE WITNESS: That reflects the amount of
 10 sales that have been generated for the ad pack.
 11 MR. FROST: Since October of 2014?
 12 THE WITNESS: That's right. And that's
 13 from account balances -- PayPal, Payza,
 14 SolidTrustPay, or bank buyers, as well as through the
 15 credit card gateway as well.
 16 MR. FROST: But 738 million didn't pass
 17 through the payment processors, did it?
 18 THE WITNESS: No. It kind of goes along
 19 with what she was mentioning earlier about the \$50 in
 20 the account balance. If someone used their account
 21 balance to make a purchase, then it counts as revenue
 22 because that's their money. It just isn't being sent
 23 to their payment processor account. But it is inside
 24 of PayPal, and it's being used to be applied towards
 25 a purchase. So it's taking that balance, being

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1 whatever their balance is, minus the purchase, and
 2 then it's being applied towards a purchase. So it
 3 comes in as being revenue for that.
 4 MR. FROST: Okay. So if someone purchased
 5 a revenue sharing position for \$50, eventually got 55
 6 and then bought a second position, and then the same
 7 thing happened a third time, that would be \$150 in
 8 revenue based on the initial \$50 cash that came in?
 9 THE WITNESS: Well, you're forgetting the
 10 outside point of view as well. Because that one
 11 person, they might have made that initial \$50
 12 purchase for the ad service, but they had clicked to
 13 qualify in revenue from all the other service sales.
 14 So that money is really there. Right?
 15 MR. FROST: Oh, I'm not saying it's not
 16 there. I'm just --
 17 THE WITNESS: Right. So then what they
 18 have made is maybe from their own individual account
 19 \$50 purchase through PayPal, but then they have
 20 qualified to share in revenue, and they receive then
 21 the 55 and they've used 50 of it to make a purchase.
 22 In our system it's showing that that's now another
 23 \$50 purchase. So if they continuously share in the
 24 revenue again and they now have received another \$50,
 25 \$55, that 50 of that amount would then be another

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1 purchase, because it's real money that they're using
 2 to make a purchase.
 3 MR. FROST: And that's how this banner ad
 4 package combo amount became so high?
 5 THE WITNESS: Right. Because people have
 6 used their account balances to make additional
 7 purchases.
 8 MR. FROST: Okay. And the second amount,
 9 "Monsoon Traffic ad package payment," is that someone
 10 buying the Monsoon Traffic?
 11 THE WITNESS: That's right, uh-huh.
 12 MR. FROST: And the PPC campaign, the
 13 pay-per-click campaign?
 14 THE WITNESS: That's right. That's the 25
 15 cents or the 50 cents.
 16 MR. FROST: Okay. Then the cash link,
 17 that's what we talked about before. That's not part
 18 of the revenue sharing?
 19 THE WITNESS: Right. That's correct.
 20 MR. FROST: Okay. And login campaign is
 21 57,000, site ad is 193, and so on. And if we look at
 22 this list, are these -- are these primary sources of
 23 revenue that are shared minus the cash links with
 24 revenue sharing programs?
 25 THE WITNESS: Or with Traffic Monsoon?

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1 MR. FROST: Yes.
 2 THE WITNESS: Right. So all of the
 3 services minus cash links are the source of revenue
 4 that we are sharing. That's right.
 5 MR. FROST: Are there any categories other
 6 than what's listed here on Exhibit 8?
 7 THE WITNESS: I don't think so. I think
 8 that I've included everything there.
 9 BY MS. OKINAKA:
 10 **Q Is there revenue coming into Traffic**
 11 **Monsoon from outside Traffic Monsoon? Do you know?**
 12 A I mean, other than -- I mean, I promote
 13 various things using our services for quality
 14 assurance. I want to make sure I'm giving people a
 15 good quality of service. So I'm earning different
 16 commissions, but that's not shared with the members.
 17 **Q Okay. Does it just go into the Traffic**
 18 **Monsoon account itself for the company?**
 19 A It did go into the PayPal account when it
 20 was active, yeah.
 21 **Q I know we're not talking about Exhibit 7 in**
 22 **detail, but I noticed when we looked at the data you**
 23 **sent that you had a large balance adjustment, the 88**
 24 **million. Can you tell us what that was for?**
 25 A What that is is -- well, there's balance

1 adjustments for various different reasons. Some of
2 those reasons might be someone was detected to be
3 cheating the system, so we removed their account and
4 adjusted their balance to be nothing. Or we detected
5 that someone tried to make a purchase, but they were
6 trying to make a purchase using their account balance
7 plus the payment processor, and every now and then
8 there's a little glitch that happens along the way.

9 So what we've done -- what I've done is
10 added to their balance an amount that would be an
11 amount to cover the rest of their purchase. Let's
12 say someone needed to have \$3 or \$14, and they were
13 making a large purchase -- or any purchase, actually.
14 Through PayPal there's a way for me to click on a
15 button to resend the instant payment notification to
16 apply those purchases automatically within Traffic
17 Monsoon. Are you following what I'm saying?

18 **Q I'm still confused.**

19 A Okay. So inside PayPal, let's say you make
20 a purchase on Traffic Monsoon. On the programming
21 side, PayPal is sending a notification to Traffic
22 Monsoon that you've made a purchase --

23 **Q Okay.**

24 A -- because my PayPal balance now increased
25 by the amount of your purchase. So it needs to also

1 reflect inside of Traffic Monsoon that you've -- that
2 you've made that purchase. So that notification is
3 known as an instant payment notification, because
4 you've made a payment on my website, and my website
5 needs to be notified that you've made a purchase.

6 But sometimes if someone is making a
7 purchase, those notifications might not get to the
8 website. Maybe there's an issue within PayPal's
9 website and it didn't get sent, or maybe there's an
10 issue on my website where it didn't get received. And
11 so somewhere in there, there's a communication issue
12 where I can go through PayPal and pull up that
13 transaction and resend that instant payment
14 notification.

15 **Q Okay.**

16 A And so if I want that instant payment
17 notification to go through, sometimes I have to
18 adjust someone's balance just a little bit for that
19 notification to go through, because it's going to use
20 a portion of their account balance to complete that
21 purchase. And so what I would do is I would remove
22 from their account balance -- or I would add to their
23 account balance the amount that needs to support the
24 rest of that purchase. I would go to my account
25 balance and remove it.

1 And so there's -- there's that large amount
2 that you were seeing that I had adjusted. Part of
3 that is that, just making sure to balance the
4 records. As I'm adding something to someone's
5 account, I'm removing it from my own.

6 **Q So you're saying it's a sum of many small
7 adjustments?**

8 A There's that, as well as I've seen a lot on
9 my account. I'll adjust it and remove it and just
10 let that store in reserves, because I would rather
11 that be held in the company than held in my own
12 pocket. I would rather it be held for members to be
13 able to qualify to share in rather than just go to
14 me.

15 **Q I had thought most of the 88 million was
16 one adjustment. Is that right?**

17 A Yeah. That's from my account, yeah.

18 **Q So -- but it sounded like that was the
19 result of a lot of small transactions. Is that
20 right?**

21 A Well, that's absolutely right. Because,
22 you know, when we were talking about how the revenue
23 sharing is generated or what happens when you make a
24 purchase, there was 15 percent of each purchase that
25 was going to my account. And so I got to a point

1 where I was like, I would rather have that go towards
2 the members and share that with them than keep it,
3 because it's just too much.

4 So over time, maybe as a couple weeks went
5 by, maybe my account balance might be a million
6 dollars. I'm like, that's just too much for me. I'd
7 rather give that to the members. So I would put that
8 in over there and adjust it as an account balance,
9 removing it from my account balance so that members
10 could qualify to share in that rather than me hold on
11 to it. I don't need it. It's just too much.

12 **Q Oh, okay. So you're saying the large
13 adjustment was the result of your --**

14 A It's a combined of all of the -- that large
15 thing is a combination of giving people's account
16 balances a little bit more to allow that instant
17 notification to complete, or to remove it from my
18 account balance to place it in the reserves so that
19 people can be able to qualify to share in that.

20 **Q To reduce the compensation you were
21 getting?**

22 A And give it to the members instead, uh-huh.

23 **Q Okay.**

24 A In fact, that's when I said, you know what,
25 instead of me doing all of these balance adjustments,

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1 I'll just lower my percentage down. And I'm still
 2 taking those types of adjustments.
 3 MR. FROST: Any idea how much of this \$88
 4 million balance adjustment was from your account?
 5 THE WITNESS: I don't remember the exact
 6 figure, but I think it was around 83, 85. I don't
 7 remember. Maybe it is 88. I don't remember it being
 8 too much more when those other balance adjustments. I
 9 think that the large bulk, like what you're saying,
 10 that's coming off of my account.
 11 MR. FROST: So you had tens of millions of
 12 dollars in your PayPal account and you gave it back
 13 to your company?
 14 THE WITNESS: I gave it to the members,
 15 yeah. And I still do that because it -- I don't
 16 really -- I'm a very frugal person, so there's no
 17 need for me to have all that. I'd rather it benefit
 18 other people.
 19 BY MS. OKINAKA:
 20 **Q You've only taken out half a million to**
 21 **date; is that right --**
 22 A That's right.
 23 **Q -- from Traffic Monsoon?**
 24 A And it was to buy a flat in the UK, and
 25 that was it.

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1 **Q And then does Traffic Monsoon pay for you**
 2 **to fly back and forth and so on?**
 3 A Yeah. There's business expenses there, for
 4 sure. So when I did my taxes I took those as
 5 business write-offs, yeah.
 6 (SEC Exhibit No. 9 was
 7 marked for identification.)
 8 **Q We're showing you Exhibit 9, and it's the**
 9 **e-mail you sent us yesterday.**
 10 A Okay. Yes.
 11 **Q And then we also -- you've provided us with**
 12 **a list of numbers that showed amounts shared on every**
 13 **day since December 1st of last year.**
 14 A That's right.
 15 **Q And I'm going to mark also a spreadsheet**
 16 **where we put those numbers into spreadsheet format so**
 17 **we could add them up.**
 18 A Okay.
 19 **Q Give me just a minute here.**
 20 (SEC Exhibit No. 10 was
 21 marked for identification.)
 22 **Q So there you go. Exhibit 9 is your e-mail,**
 23 **and Exhibit 10 is the spreadsheet that reflects your**
 24 **figures.**
 25 A Okay.

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1 **Q So this information you've given us, in No.**
 2 **2 you say how many active sharing positions at**
 3 **present; and that -- is that the people who have**
 4 **purchased one service that are now qualified for**
 5 **life?**
 6 A Well, what it is is when people buy the ad
 7 pack, they're getting the ad service with the revenue
 8 sharing position. So what it's showing there is the
 9 total number of sharing positions is that first
 10 number, the 15,225,689. And then how many of those
 11 have not yet reached their max, it's that 7,504,340.
 12 **Q Okay.**
 13 A Then what I noticed is that that number is
 14 varied by one. I think when we were pulling the
 15 report, someone bought an ad pack. So I think that's
 16 what it is.
 17 **Q Oh.**
 18 A But anyway, what you're seeing is that
 19 number -- the number of active positions is also in
 20 No. 7, saying here is the number that's awaiting
 21 PayPal's release. And then the number of active is
 22 how many have yet to receive up to the fullness of
 23 the \$55. It doesn't mean qualified, because there's
 24 not -- there's not a figure here showing how many are
 25 qualified at that given interval of time.

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1 **Q So tell me again, No. 2 is the sharing**
 2 **positions that have not reached their max?**
 3 A That's correct.
 4 **Q Okay. Meaning \$55 of sharing?**
 5 A Uh-huh. That's right.
 6 MR. FROST: So does that mean, just to take
 7 an example, if revenue of one day from the prior 24
 8 hours was a dollar, then you would -- I'm sorry. If
 9 your algorithm or whatever you had determined that a
 10 dollar would be paid out per ad pack, would you pay
 11 out \$7.5 million in revenue that day?
 12 THE WITNESS: Well, you're looking at
 13 reverse. What we do is we look at, first of all, how
 14 much revenue there is to share; and then we take how
 15 many active or qualified sharing positions there are,
 16 and we divide the amount there is to share and then
 17 put them into positions and divide that up evenly
 18 equally.
 19 So we don't determine how much we want to
 20 give and then multiply that out that way. That would
 21 be wrong, because what if we don't have enough money
 22 to do that? So we first take how much money there is
 23 to share and then divide it up into how many
 24 positions there actually are that are qualified.
 25 MR. FROST: I see.

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1 BY MS. OKINAKA:

2 **Q So No. 5 where you say "How much revenue**
3 **has been shared with the positions in total," is this**
4 **from inception till May 16th of this year, 618**
5 **million or so?**

6 A Which number is that? No. 5?

7 **Q No. 5.**

8 A Yes, that is correct.

9 **Q And this includes the use of account**
10 **balances to buy ad packs?**

11 A That's right, uh-huh.

12 **Q Okay. How many -- No. 6, how many -- oh,**
13 **okay. So if you look at Exhibit 8, which is the**
14 **little spreadsheet that came from the e-mail --**

15 A Uh-huh.

16 **Q -- that's the one. There's a figure there**
17 **of revenues from banner ad package combos that's**
18 **738.5 million. Is that the same -- it looks like it**
19 **has -- you have differing numbers for the same value.**

20 A Well, that is how much revenue has been
21 generated. But remember, we also --

22 **Q Exhibit 8?**

23 A Exhibit 8, yes. But there's also the 10
24 percent commissions that get paid out as well, so
25 that wouldn't be shared because you can't double

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1 count that money.

2 **Q Yeah. So that would account for the**
3 **difference there?**

4 A I believe so.

5 **Q Are there any other factors that would**
6 **account for it?**

7 A I might check with my programmer and see,
8 because he's put this together. But that's what just
9 came to my mind right away is that when you're
10 looking at how the revenue is shared, there's some
11 that gets shared and some that goes into the revenue
12 sharing or the, you know, sponsor commissions, some
13 that goes to the company, some that goes to the
14 reserves.

15 **Q So Exhibit 8 was revenue generated. Is**
16 **that what you were saying?**

17 A Right. That's revenue generated, that's
18 right.

19 **Q Okay. And Exhibit 9, the question I asked**
20 **you was how much revenue has been shared, and that's**
21 **going to be different?**

22 A Right. That's correct.

23 **Q Okay. No. 7 of Exhibit 9, how many**
24 **positions have not yet reached the max -- is that**
25 **have not yet reached the \$55 fill line?**

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1 A That's right.

2 **Q And this is numbers of positions, not**
3 **dollar amounts, I guess?**

4 A Right. Not dollar amounts, because they're
5 not worth anything. They're just positions.

6 **Q So in the next set of responses you give us**
7 **in this e-mail, Exhibit 9, it says pay-ins table for**
8 **each category since February 10th. And your first**
9 **item here is banner ad package combo. That's ad**
10 **packs. And it shows 71.1 million.**

11 A Uh-huh.

12 **Q Is this -- is this figure showing actual**
13 **cash coming in as opposed to use of account balances?**

14 A As it explains on page 2, it says -- let's
15 see. It's talking about the purchases through all of
16 the different payment gateways.

17 **Q Okay.**

18 A So that would include account balance, so
19 if someone is using their account balance.

20 MR. FROST: Account balance in, say,
21 PayPal -- or not PayPal but Payza or --

22 THE WITNESS: In the pay-ins table it would
23 show up as being a manual payment if it was using
24 their account balance.

25 MR. FROST: And that's what this is, the 71

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1 million?

2 THE WITNESS: So it's combination of all of
3 the different methods of payment that we accept,
4 which would include account balance, as has been
5 mentioned.

6 MR. FROST: Okay.

7 BY MS. OKINAKA:

8 **Q Okay. I think we understand that.**

9 **And No. 9 on the same page, total active**
10 **balance on each member account, what's that?**

11 A What that is, if you look at every member
12 account balance and you add it together, so if you
13 take I.D. No. 1, I.D. No. 2, I.D. No. 3, I.D. No. 4,
14 I.D. No. 5, and you add all of the I.D.s up until the
15 very last I.D., you add up all of the account
16 balance, it's \$4,133,825.64. So that's the total on
17 everyone's balance. So if you've earned 10 percent
18 commissions, if you've been sharing in revenue,
19 whatever your account balance is, when you add that
20 together with all of the other members that are
21 involved in the program, that's the total that is
22 there.

23 MR. FROST: Does that mean all the
24 purchases made by members?

25 THE WITNESS: No. This is earnings. So if

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1 you log in to your back office and you look at how
2 much you've earned, your current balance, what you
3 can either use to make a purchase or use to send to
4 the payment processor. That's what that's talking
5 about, that balance. So that balance is a live
6 reading of how much you have actually on your
7 account. So you can use that money or withdraw that
8 money and send it to your payment processor.

9 BY MS. OKINAKA:

10 **Q So this is the amount that I could**
11 **withdraw --**

12 A Right.

13 **Q -- all members could withdraw?**

14 A Right. So that's what this is definitely
15 illustrating. Everything that is on every single
16 member account balance, if added together, that's the
17 total.

18 MR. FROST: I'd like to look back up at 8
19 again just real briefly to make sure this is the
20 same -- the same data we're looking at since February
21 10th as we were looking at in Exhibit 8. You show
22 the Monsoon Traffic netted sharing revenue, that
23 \$43,000 amount?

24 THE WITNESS: Right. So that is revenue
25 that's been generated towards one of the advertising

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1 THE WITNESS: I could double check and find
2 out. But I believe so. I think that's all the
3 services that are being offered.

4 MR. FROST: Okay.

5 THE WITNESS: It's a lot of cash links.
6 People really like getting traffic that way. It's
7 one of our most popular ways of getting traffic.

8 MR. FROST: And next item, No. 10. I know
9 we've talked about this before, but would you explain
10 to us again what this balance reflects?

11 THE WITNESS: Sure. It's similar to the
12 active balances on member accounts. So if you were
13 to add together all of what people have on their
14 account balances, there's an amount that had to go
15 into pending because we're waiting on PayPal to
16 release those funds. So what it is is all of the
17 people that have earned anything towards their
18 account balance, that's the 27 million figure, that
19 if you added together everything that's on everyone's
20 account balance previous to when PayPal limited the
21 account. And we've put that date as being February
22 10th in our system, even though they limited any
23 money going out starting in January.

24 It took me about a month to try to figure
25 out how are we going to address this situation,

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1 services, and that is revenue that would be shared
2 with people who qualify. That's absolutely right.

3 MR. FROST: Okay. And then the PPC
4 campaign is also revenue that would be shared, the
5 1.9 million?

6 THE WITNESS: That's right. So that's
7 people buying the advertising service.

8 MR. FROST: And the cash link, as we
9 discussed before, would not be part of the revenue
10 that would be shared?

11 THE WITNESS: Right. Cash links are not
12 shared.

13 MR. FROST: The login campaign would be,
14 and the site ad would be?

15 THE WITNESS: Uh-huh.

16 MR. FROST: And the start page campaign and
17 the text ad PPC campaign, those would all be
18 included?

19 THE WITNESS: That's right. That's right.
20 So the cash links, those are -- that's the only one
21 that's not included in the revenue sharing. All
22 other services are.

23 MR. FROST: And this is the total of all
24 the revenue that Traffic Monsoon has received since
25 February 10th?

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1 because people are requesting to get paid and I can't
2 pay them because PayPal's holding all the money. So
3 that's when -- because PayPal's final cutoff, because
4 they limited the account also in February, so there
5 was revenues coming in and sales generating through
6 PayPal until February 10th or 11th. I don't remember
7 which day. I think it's the 10th.

8 So from when the payments cut off from
9 PayPal from coming in, we took all of those balances
10 because all of that revenue, all of the sales that
11 were generated for the services, that money is now
12 held by PayPal and I can't pay out with it. So
13 that's where it's gone into pending while we're
14 waiting for PayPal to release those funds. So what
15 you're seeing in No. 10 is what everyone has earned
16 total towards the funds that are currently being held
17 by PayPal. So that's that 27 million figure.

18 Then when you go to page 2, it shows how
19 much is total inside of PayPal is the 55 million. So
20 there's more inside of PayPal than is actually owed
21 to the members.

22 MR. FROST: What about balances that
23 haven't been paid yet? Because I'm sure some
24 members -- say, for instance, they bought an ad pack
25 on February 5th and they've only earned five dollars.

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1 Are you accounting for that somewhere, that they're
2 going to be -- they should be in a sharing position
3 at some point in the future?

4 THE WITNESS: Right. So if someone
5 purchased an ad pack on February 5th and they've been
6 clicking through the traffic exchange, they've
7 qualified for sharing and they've received, in your
8 example, five dollars. And then PayPal limited the
9 account, and now I can't send them the five dollars.
10 So that five dollars is still there on their account
11 balance.

12 Inside of Traffic Monsoon, what it has is
13 the active balance and then a pending balance. So
14 the active balance is showing what we can actively
15 send to you, and then the pending balance is what's
16 being represented inside of PayPal. So the funds
17 that are being shown on the page, all of that
18 pending, if you look at the pending balance of every
19 single member, all of the number of people that have
20 anything that's pending, adding together all of that,
21 that's what this No. 10 is the total pending
22 balances.

23 MR. FROST: And what I'm wondering is the
24 money that isn't pending, the guy who bought a \$50 ad
25 pack and has only received five dollars, he still has

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1 owed -- they're still in a position to earn revenue?

2 THE WITNESS: Right. So it's saying
3 pending, waiting PayPal release on No. 7 in Exhibit
4 9, the 6 million is currently pending. That's the
5 total number of pending positions that are waiting
6 PayPal's release.

7 MR. FROST: Oh, okay. So those are --
8 well, are they ad packs?

9 THE WITNESS: Well, they're sharing
10 positions --

11 MR. FROST: Sharing positions.

12 THE WITNESS: -- which they only can get if
13 they bought an ad pack. So these are not ad packs.
14 The advertising service that they've paid for has not
15 gone into pending. The service actually that they've
16 paid for is still being delivered.

17 MR. FROST: Okay.

18 THE WITNESS: Just, the revenue that's
19 being held on that account, I can't touch it, so it
20 needs to be just put into pending until we get that.

21 MR. FROST: Why wouldn't you continue to
22 share revenue with them? I mean, I understand that
23 the money that they've received so far in the example
24 we've talked about, five dollars, but what about
25 February 11th and 12th? Why wouldn't that person be

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1 a revenue sharing position, doesn't he?

2 THE WITNESS: He does.

3 MR. FROST: And will that kick in once the
4 funds are released from PayPal?

5 THE WITNESS: From PayPal, right.
6 Absolutely.

7 MR. FROST: But right now it's just
8 inactive?

9 THE WITNESS: It's just in pending, right.
10 It's because the majority of the revenue that we've
11 generated has come in through PayPal, and so those
12 positions are now in pending because all of that
13 money is pending. We don't know if -- I mean,
14 there's some people that speculate that PayPal will
15 never release it. I think that's ridiculous. I
16 believe they will. But as a business, I have to
17 prepare for that potential. If they don't release
18 it, then these positions, then, are nothing.

19 MR. FROST: If they do release it, though,
20 you're going to have to split the revenue with a lot
21 more people.

22 THE WITNESS: Right, right. That's
23 correct.

24 MR. FROST: So do you know how many ad
25 packs are in that position where they're still

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1 able to share in the revenue?

2 THE WITNESS: The main reason why is inside
3 of our database, those positions, as you can see in
4 Exhibit 7, it shows up as an ad pack pool. So when
5 we put people's balances in pending, it goes by a
6 date range. So that ad pack pool or that sharing
7 position is now based on a date range within the
8 database. So those portions of balances are all
9 being put into pending, if that makes sense. So that
10 position in the database is gauged on a date range,
11 if that makes sense.

12 So that would not only put the amount of
13 that sharing position in pending, because it would
14 then put that portion of the balance in pending, but
15 it would also make it so that if we shared anything
16 more with it, it would just count towards the pending
17 balance instead of actually towards the live
18 balance --

19 MS. OKINAKA: Okay.

20 THE WITNESS: -- because it's based upon a
21 date range.

22 MR. FROST: So it's a programming issue
23 with your database?

24 THE WITNESS: It's just the way that it's
25 kept records is each sharing position is marked by a

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1 date range. So since these sharing positions have
2 been in that date range and shared in revenue from
3 PayPal, they are now having to be placed into pending
4 until they release those portions of the balance that
5 back those balances up.

6 So that's why both the positions -- from
7 maybe a member perspective, it's maybe they think
8 it's two separate things, like it's a position and a
9 balance. It's the same; you know what I'm saying?
10 The balance that's being -- inside that ad pack pool,
11 that's a position that they're qualifying to receive
12 an increase towards.

13 Maybe I'm not explaining it correctly.

14 BY MS. OKINAKA:

15 **Q Oh, no. I think -- so the guy who has**
16 **earned five dollars and then the freeze went into**
17 **effect, he's still earning -- I mean, he's still**
18 **entitled to earn if he qualifies until -- and so that**
19 **additional money that he's entitled to, the**
20 **additional profit, will that be paid when the freeze**
21 **ends?**

22 A I'll explain it a little bit better. When
23 someone buys an ad pack, what they receive is a
24 service, and then what they receive in their cash
25 history or their balance history on their account is

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1 this ad pack pool thing. It's a position. And it
2 starts out at zero.

3 And then when they click and qualify to
4 receive the revenue, whatever the revenue is, it gets
5 shared with them. And so that same record, let's say
6 it's dated with today's date. Today's date will
7 always be on that record; but when the revenue gets
8 shared, it will say, okay, so our system will say
9 we've got this amount of revenue to share, this many
10 positions, divide, and then -- let's say whatever it
11 is, let's say a penny, gets shared with all the
12 different positions. So when that penny gets shared
13 out, it will say whatever that balance is, whatever
14 amount, plus one cent. You know what I'm saying?

15 **Q Uh-huh.**

16 A So whatever that revenue is, it gets shared
17 with whatever those positions are. But in the system
18 it's got that date-time stamp. So when PayPal
19 limited the account and I could no longer access the
20 funds that backed up those portions of account
21 balances, that account balance was then put into
22 pending, which meant that I can't add anything to it
23 anymore --

24 **Q Oh, okay.**

25 A -- until it comes out of pending. So when

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1 PayPal releases the funds, those sharing positions
2 would then go active again as well. And so then when
3 people are continuously buying the services, they
4 could continuously click and share in the revenue as
5 well.

6 **Q So when it comes out of pending, will they**
7 **be credited for the revenue that should have been**
8 **shared with them during that intervening period?**

9 A No. It would be impossible to do that.

10 **Q They'll just start from where they're at?**

11 A Start from where they're at, right.

12 **Q Oh, okay.**

13 A Plus, I think it's safe for me to take that
14 route, because some of these people, they've opened
15 up disputes for these purchases. So --

16 **Q And you don't know what will happen with**
17 **that?**

18 A Right, right.

19 **Q Do you need to do your parking?**

20 A Yes.

21 MS. OKINAKA: We'll go off the record.

22 We'll just take a break.

23 (A brief recess was taken.)

24 BY MS. OKINAKA:

25 **Q So we're back on the record at 2:36. And**

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1 **while we were taking a break, we didn't talk about**
2 **the case, did we?**

3 A No, we did not.

4 **Q We're showing you Exhibit 10 again.**

5 A Okay.

6 **Q It's the table that we derived from your**
7 **e-mail that was Exhibit 9.**

8 A Okay.

9 MR. FROST: And all we did was, I just put
10 it in an Excel spreadsheet and separated it into two
11 columns. So you can compare the other exhibit with
12 your e-mail to this if you'd like. We didn't change
13 any of the numbers doing it.

14 THE WITNESS: Okay.

15 MR. FROST: We did add some totals at the
16 bottom, if you -- well, first of all, why don't you
17 tell us what these numbers represent in Exhibit No.
18 10.

19 THE WITNESS: Well, I asked my programmer
20 to provide for me an amount that was shared on each
21 day, starting December 1st. The intention was, I
22 think you had asked for how much had been shared with
23 each position, but there's not a historical view of
24 how much or how many positions are qualified on those
25 dates. So he said that he'll get to work on seeing

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1 what he can do as far as getting how much money was
2 actually shared on those dates. So this was what my
3 programmer gave me.

4 MR. FROST: And this is the amount of money
5 that was shared each day, and so this amount would be
6 divided by the number of sharing positions.

7 THE WITNESS: Right, however many that is
8 which have qualified for sharing.

9 MR. FROST: Qualified sharing positions?

10 THE WITNESS: Yeah.

11 MR. FROST: Okay. And if we go to the last
12 page -- and this is just from December 1st through
13 May 15th. And total amount -- total amount dollars
14 shared from December 1st to May 15th is 397,562,000.

15 Now, could you explain to us, this doesn't
16 mean actual cash at PayPal or some money processor,
17 does it? Or what does it mean?

18 THE WITNESS: Well, this is a combination
19 of money that has come in to the payment processors,
20 but also a compilation of when people use money
21 inside of their Traffic Monsoon account to make a
22 purchase. Then that revenue is then accounted for
23 inside PayPal or Payza or SolidTrustPay, but it's now
24 being shared because someone used that inside of
25 their Traffic Monsoon balance to make a purchase, and

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1 so now it's being shared. So it might not be money
2 that is now coming out from someone's bank, because
3 we're holding it inside of one of our payment
4 processor accounts. And now it's no longer
5 attributed to them, because they used that money for
6 a purchase. And we've covered that before.

7 MR. FROST: And again, on the last page I
8 did add up the monies paid each day from February
9 10th through May 15th, which is I believe the time
10 since PayPal froze the funds. So this would have
11 been transactions outside of PayPal.

12 THE WITNESS: Right. You can definitely
13 see a drop on February 10th, because there were less
14 purchases because PayPal wasn't processing that day.

15 MR. FROST: I noticed throughout February,
16 even though money was not able to go out of PayPal,
17 there still seems to be a lot of money that was -- a
18 lot of revenue that was being paid, or credited to
19 accounts. How would you describe that?

20 THE WITNESS: Well, we still had sales
21 coming in through all of the other different payment
22 processors, which included account balances.

23 MR. FROST: What percent of your business,
24 say, in February of 2016, was from -- went through
25 PayPal, would you guess?

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1 THE WITNESS: I'd really have to crunch the
2 numbers to look at it, just so I could be sure. I
3 just don't know right off the bat. But definitely a
4 large percentage of the business comes in through
5 PayPal. If I was to estimate, without looking at the
6 numbers, I'd probably say more than 95 percent of the
7 business was coming in through PayPal. But if I
8 looked at the numbers, I might discover that I'm
9 wrong. So I don't really know. Definitely PayPal
10 was a major source of sales, because people enjoy
11 using PayPal more than anything else.

12 MR. FROST: Okay. And it looks like from
13 January 10th, 11th, 12th, the amounts just kept
14 increasing --

15 THE WITNESS: Yup.

16 MR. FROST: -- to February 9th to 6.5
17 million. And then February 10th is when it was
18 frozen?

19 THE WITNESS: Yeah. That's when they
20 stopped allowing purchases to come through PayPal.

21 MR. FROST: Okay.

22 THE WITNESS: It was in January that they
23 stopped allowing money to go out from PayPal, but
24 then they left it on for another 30 days for
25 purchases to continue to come in.

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1 MR. FROST: So when did -- they told you
2 about that in January sometime?

3 THE WITNESS: January, uh-huh.

4 MR. FROST: They told you they were not
5 going to allow money out?

6 THE WITNESS: That's right.

7 MR. FROST: At what point did you realize
8 they were going to not allow money in or out?

9 THE WITNESS: Well, they told me that
10 purchases would be allowed to be on for another 30
11 days as the transition away from PayPal, and then
12 after 30 days I wouldn't be able to process
13 purchases. So they told me at that same time. I
14 think it was January 11th.

15 MR. FROST: Okay.

16 (SEC Exhibit No. 11 was
17 marked for identification.)

18 BY MS. OKINAKA:

19 **Q We're showing you Exhibit 11, and it's just**
20 **a screen shot of the beginning of a YouTube video**
21 **that I'd like to know if you remember this video that**
22 **you published on January 12th of this year --**

23 A I do remember that one, yeah.

24 **Q -- where you say "Traffic Monsoon is**
25 **transitioning into our own TM World Bank to make it**

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1 easier for members to get paid."

2 So transitioning, I think you spoke about
3 the plan to transition away from PayPal into other
4 payment processors and then eventually to a bank. And
5 was this after you learned about the limitation on
6 the account?

7 A Well, we had met with someone in London.
8 His name is Sayeed. I don't remember his last name
9 now. I've got it on my phone, I think. But Sayeed,
10 he had set up a bank for another company before, and
11 he was telling us that he could do the same thing for
12 us, and he was talking about the dangers of using
13 PayPal or other different payment processors. And he
14 said that he could set one up for us and that we
15 could have our own credit cards, our own processing,
16 not only for purchases, but then we could issue
17 Traffic Monsoon bank cards for people to get paid out
18 on, and we could save members a lot of the
19 transaction fees. And I just thought, you know, this
20 actually sounds like a really good idea.

21 So we started going through the process of
22 filling out documents and know your customer -- KYC
23 kind of stuff to apply for a bank. And while we were
24 in Dubai, we were still filling out that paperwork.
25 So when I got that phone call from PayPal --

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1 needing to part ways with your business.

2 And I was like, why?

3 And they said, because your company is
4 growing too fast in too short amount of time.

5 And I was like, yeah, but that doesn't make
6 sense. Give me a better explanation of this.

7 And he said, well, it's just because of how
8 much growth you have.

9 I'm like, yeah, but that doesn't increase
10 the risk on you guys. I was explaining to them how
11 much was on each member balance, the amount that's in
12 reserves, helping them recognize that they're not
13 really experiencing any greater increase in risk,
14 because if there's a percentage of chargebacks, it's
15 less than half a percent.

16 Even if we're increasing in sales, that
17 percentage is still the same. So the actual risk
18 factor is exactly the same with the growth. And they
19 said, sorry; we've discussed this through a number of
20 different departments, and this is not something that
21 you can appeal.

22 MR. FROST: Do you recall who was on the
23 phone call from PayPal?

24 THE WITNESS: Yeah. I wrote it down in an
25 e-mail to Dennis. But now that it's been so long,

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1 actually, it was conference call that they asked me
2 to call in to.

3 So when I called in I was asking them, you
4 know, what can I do to help you guys? Because I'd
5 just had a really good conference just a couple weeks
6 before, congratulating me on the growth of the
7 business, telling me how great my chargeback ratio
8 was, how it was less than half of a percent, telling
9 me things like out of all of the merchants at your
10 sales revenue level, you're the best performing, and
11 all these really nice things to say about my
12 business. And they said, we don't know how you're
13 doing that, but keep up the good work. So it just
14 felt like everything was on the up-and-up with
15 PayPal.

16 So in January when I was just heading out
17 to Dubai, that's when they called me is my first
18 night there. Because I said, well, is it
19 something -- is the issue pressing? Should we set it
20 up before I get to Dubai? And he said, well, just
21 call us when you get there. So I was like, all
22 right, so it's not pressing. That's good.

23 Q So what did they tell you when you called?

24 A So I called them, and they said, Charles,
25 we're sorry to inform you, but we are now at PayPal

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1 trying to remember the name. It's my account
2 manager, and -- oh, I'd have to pull it up.

3 BY MS. OKINAKA:

4 Q So when they called, did they talk to you
5 about the plans to limit your account?

6 A Yeah, they did. They said that their
7 strategy for the separation, we're moving away from
8 Traffic Monsoon and PayPal working together. They
9 said that they're going to allow sales to remain on
10 for 30 days, but no money could come out.

11 I said, actually, I think I'd like that
12 reversed, because I want to keep paying people. And
13 that's what I was telling them on that phone call.

14 It would be great if I had that phone call
15 recorded, because I was pleading -- because my desire
16 is to pay the people. And that's what I was -- I was
17 on the phone just trying to explain to them there's
18 people who have walked away from their day jobs to
19 sell Traffic Monsoon services. There's been people
20 that have no other source of income. So if they have
21 no source of income and now the income that they've
22 earned on Traffic Monsoon cannot be paid to them,
23 it's going to really impact their lives, especially
24 when it's -- okay, it's January 10th or whatever.
25 They only have a couple weeks before the beginning of

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1 the next month to figure out a plan, you know.

2 MR. FROST: Did PayPal at any point during
3 this conversation, or even prior to that, give you an
4 option of returning monies that had come in from
5 people?

6 THE WITNESS: Well, they have. They said,
7 Charles, we won't allow you to send any money out to
8 anyone, but you can refund people. And I was like,
9 okay, but you guys don't understand. If I do those
10 refunds, then member balances would be unsupported.
11 The commissions that have been paid to the sponsors
12 for selling the services, now I've reversed that, so
13 that means the money that's been awarded to that
14 account needs to be reduced as well. It will just be
15 a headache and a hassle to try to find out who's been
16 reversed, how much of that gets reversed. And then
17 what about the amount that's already been paid out?
18 So I've already paid out these commissions to some of
19 these people, and they've sent them to their banks.

20 So if I refund someone but they've already
21 cashed out those commissions and sent them to their
22 PayPal account, they've sent them to their bank, I
23 can't get it back. So how in the world am I supposed
24 to say, okay, I'll just refund these people? That
25 doesn't make any sense, because now my business is no

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1 options to you in terms of paying people back?

2 THE WITNESS: Well, no, other than just
3 refunding people for their purchases of service. I
4 was wanting to get people paid for what they have
5 earned or what they had qualified to share in, you
6 know, because ultimately people I knew were going to
7 be blaming this on me.

8 BY MS. OKINAKA:

9 **Q So this call -- well, this webcast that you**
10 **did was on January 12th, this Exhibit 11, and --**

11 A So it kind of comes as a way of -- in my
12 position, I was talking with some people that were
13 there, and I said, how am I supposed to release this
14 news in a way that doesn't cause people just to open
15 up a massive amount of disputes? Because if we come
16 right out and tell people, "We just lost PayPal,"
17 then people would just go straight to PayPal and open
18 disputes. And that's one of the things we definitely
19 didn't want to do.

20 So I was talking with a friend of mine who
21 was involved in Traffic Monsoon. He's an attorney in
22 the UK. I asked him, What are your thoughts?

23 And he said, Charles, since you are trying
24 and you've been working on opening up your own
25 Traffic Monsoon bank, then let members know that. And

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1 longer supported and member balances go into
2 negatives and all kinds of things. It doesn't make
3 sense.

4 MR. FROST: When did they give you that
5 option?

6 THE WITNESS: I'm trying to think. I think
7 they gave me that option on that call.

8 MR. FROST: Early January?

9 THE WITNESS: January 11th.

10 MR. FROST: January 11th.

11 THE WITNESS: When I was on call with them.
12 They said that the only thing that -- they said,
13 we're restricting all access other than with making
14 purchases. People can continue to make purchases,
15 but no money can come out, but you can give people
16 refunds.

17 BY MS. OKINAKA:

18 **Q Do you know why they did it that way, no**
19 **money can come out -- no --**

20 A Money can come in but can't go out?

21 **Q Yeah. Why --**

22 A I have no idea. I asked them, and they
23 said that's just the decision that they've made in
24 parting ways with Traffic Monsoon.

25 MR. FROST: Did they offer any other

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1 since we are now in this transition, let people know
2 that we are transitioning away from PayPal, because
3 that's what PayPal has said to you is that there's a
4 transitioning away from each other.

5 I'm like, okay. So I'm transitioning away
6 from PayPal, and now we just need to wait six months
7 for those funds to come out. And PayPal did tell me
8 that they're going to review the count each 30 days
9 to release funds, and so that's what I was telling
10 people.

11 And then I wanted to let people know in
12 this video that a lot of people were sending out all
13 these rumors that we all ran out of money, and I
14 wanted them to know we didn't. That's not the case
15 here. The money is there. It's not like I've
16 created some kind of a scheme that I'm telling you,
17 you're earning money but the money's not really
18 there, something like that. The money is there, and
19 I wanted them to see that.

20 So I showed, you know, going into these
21 different payment processors, showing people how much
22 is actually there, just to help prove, look, you
23 guys, the money is there. This is a situation that's
24 going on moving away from PayPal, and now we have to
25 wait for those funds to be transitioned out of

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1 PayPal.

2 MR. FROST: So during -- from January

3 12th -- 11th through 12th through February 10th

4 through 11th, I assume people tried to get money out

5 of PayPal?

6 THE WITNESS: Yeah.

7 MR. FROST: What were they told?

8 THE WITNESS: Well, that's the really

9 confusing thing. Because from our side, at first

10 people were making those requests, and I had to

11 cancel them. So I turned off withdraw requests

12 through PayPal and said, you guys can withdraw

13 through Payza now; because we had funds in Payza and

14 also funds in Solid Trust.

15 So then what happened is the account member

16 balance -- or, I'm sorry -- the earnings on those

17 accounts was actually mostly supported inside of

18 PayPal. So when there was that big rush of requests

19 for money, it depleted what was inside of Payza and

20 what was inside of Solid Trust. Then I was trying to

21 send money from my bank to Solid Trust. And my bank,

22 for whatever reason, has wrongly identified

23 SolidTrustPay as being a gambling site. And I think I

24 mentioned that in this video.

25 And Payza, it's going to take some time. I

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1 had some money in my bank, so I was sending all of

2 the money straight over to Payza. And since I was

3 international at the time, I was sending \$100,000

4 every single day until I was all out of money myself,

5 because I just wanted to pay people. That was the

6 big goal.

7 And that's why I was in Dubai as well is

8 because we had some people there who were saying, I

9 think we can help. We've got some money. How much

10 do you need? Let's work out an arrangement. But all

11 of those deals fell through, and nobody probably ever

12 had any real money. But they probably want just to

13 work out some deal from us to get something from me

14 first as collateral, which they would never be able

15 to deliver. So sorting through all of that, ended up

16 walking away from Dubai saying, I'm not going to fall

17 for any one of those traps.

18 But when people were trying to get money

19 out of PayPal and then they didn't see PayPal as an

20 option to withdraw from my site, they were contacting

21 PayPal and asking questions. And there's been so

22 many people in different forums that have said that

23 PayPal told them they're not holding onto any money.

24 Sometimes people were told from PayPal, there's no

25 money inside of Traffic Monsoon's account. Sometimes

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1 they're being told, oh, well, Traffic Monsoon is a

2 scam, so we aren't going to do business with scams.

3 So make sure to go to your bank and open up a

4 chargeback.

5 So PayPal was telling these people to go to

6 their banks and open up disputes with their banks to

7 get money back, recommending people to open up

8 disputes with PayPal to get their money back, telling

9 people that I'm operating some kind of a scam. And

10 I'm not. And so it really bothered me that PayPal

11 and that customers of mine were telling me this is

12 what PayPal has said.

13 So I've got some sound recordings on my

14 computer of what PayPal has said, and I sent them

15 over to Dennis. And so we were going to pursue them,

16 but it didn't look like anything would actually ever

17 come from that anyway.

18 BY MS. OKINAKA:

19 **Q So in your webcast on January 12th, you**

20 **didn't tell people that PayPal had said they were**

21 **going to freeze the account.**

22 A And the main reason why is because in the

23 industry -- I've seen this happen to other sites

24 before -- when a site releases that they've lost

25 PayPal and to wait 180 days, people just go, dispute,

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1 dispute, dispute. So we wanted to portray the same

2 type of message that we're needing to transition

3 those funds out of PayPal. It may take some time.

4 But I didn't want to up front tell them exactly what

5 had gone on, just to avoid the massive number of

6 disputes. But then as people kept asking questions,

7 I was like, you know what, I'm just going to tell

8 people what's really been going on, because I try to

9 be as transparent as I possibly can that way.

10 MR. FROST: But you didn't do another

11 video, did you, until after -- I think the next one

12 was in March.

13 THE WITNESS: I did another one. I was

14 still in Dubai, and I was telling people what was

15 going on. But I don't -- I don't know if it's

16 uploaded on my channel. I think it's on Amar's

17 channel.

18 BY MS. OKINAKA:

19 **Q So your attorney friend in the UK, what's**

20 **his name?**

21 A Amar Alyas. A-m-a-r, and last name is

22 A-l-y-a-s.

23 **Q Did he advise you not to tell the members**

24 **that what -- you know, the details of what had**

25 **happened with PayPal?**

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1 A He was saying, avoid saying that you're
2 limited right now, because that would just cause
3 panic, and put this as a positive spin. He said,
4 what you probably want to do is take this as a
5 proactive kind of approach that we are moving away
6 from PayPal. Because even though it was forced on us
7 by PayPal -- just word it that way in a sense --
8 because we are actually moving away from PayPal. And
9 if -- I really wish in some ways that a lot of this
10 was known at the time, but, you know, with the bank,
11 we don't know if that's actually going to happen,
12 because we have to wait for those funds to come out
13 of PayPal anyway for that initial deposit. And
14 hearing a lot of people's concerns about opening up a
15 bank, it's now causing me to think, well, if there's
16 all these concerns, maybe it would be best not to do
17 it.

18 **Q So you're not sure if you're going to do**
19 **the Traffic Monsoon bank?**

20 A Yeah, I don't know. But at the time we
21 were thinking, well, we've got to transition those
22 funds out of PayPal anyway, and it would probably
23 take six months for that anyway. So that's why we
24 said it the way that we did.

25 MR. FROST: What is your current plan for

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1 the money once PayPal releases it?

2 THE WITNESS: Well, the current plan is
3 first we need to see how PayPal's going to release
4 it, because I've added my business account to the
5 PayPal account now, so I'm going to want them to send
6 it to my business account, and then from that I can
7 send it to Allied Wallet. I can send it to Payza. I
8 can send it -- still working on the SolidTrustPay
9 thing. So we'll see what we can do as far as getting
10 people paid with the money that's actually being
11 released.

12 MR. FROST: So when you say send it to your
13 account, you have another Traffic Monsoon account at
14 PayPal, or just your own name? Or what is that?

15 THE WITNESS: So what I mean is there's --
16 the funds right now are inside of the PayPal account
17 already. And what we want to do is move those funds
18 to a position where we can pay the people. To do
19 that, I would have to first send it from PayPal to
20 the Traffic Monsoon bank account that's at Chase, and
21 then from Chase then I could send that to Allied
22 Wallet, because what Allied Wallet has are these
23 cards that I can pay people with. So that's the
24 goal, but there's definitely people that don't want
25 those cards. They would prefer getting paid through

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1 Payza or SolidTrustPay.

2 So I'd have to find out how much those
3 requests are, kind of gauge the trends, and just make
4 sure to get the money where it needs to be. But I'm
5 probably going to do that in a staged release,
6 because I wouldn't be able to move all that money all
7 at once. And I'm guessing that PayPal is probably
8 not going to release it all at once, either. And I'm
9 hoping that they do release some early, because then
10 that could help make that staged release a better
11 transition.

12 MR. FROST: I know when we talked a few
13 weeks ago you said that your plan was to move the
14 PayPal money to TM bank, but it sounds like that's
15 probably a little bit from now.

16 THE WITNESS: We'll have to see. I mean,
17 it's all waiting for PayPal to release the funds, and
18 that's in August. So definitely there's been a lot
19 of thought, but it's also kind of tentative because
20 that's in August and it's about three months away
21 still.

22 So I haven't made a firm, like, do we still
23 open the bank or not? There's a part of me that
24 wants to, because there are so many people out there
25 that are haters who have been saying, you can't do

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1 that, and I want to prove them wrong and just show
2 them we can do this; we can pull this off, and we're
3 going to make people so happy. But if people are
4 happy with what we've got, then there's a part of me
5 that's like, we don't really need it, but it will be
6 good in some ways.

7 MR. FROST: Have you spent money so far to
8 open a Traffic Monsoon bank?

9 THE WITNESS: Let me see. I've wired some
10 money to Sayeed to cover some of the fees and
11 expenses. I think it was something like \$45,000 or
12 \$50,000, something like that.

13 MR. FROST: And it's not in process now, or
14 is it in process?

15 THE WITNESS: It's been a while since I've
16 spoken with Sayeed about it, but he did say that it's
17 just pending the PayPal release. Because if I
18 understand it correctly, and I just have to speak
19 with him more to get -- if you had specific questions
20 about the bank, I could definitely make sure to get
21 the answers for you, because it's really just his
22 team that's doing it all. And I have full trust in
23 him, because I know him and I've been around him
24 quite a bit. Plus, I have a friend that's been
25 friends with him for years, so there's a really good

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1 trust factor there.
2 So I believe that what he's doing is real.
3 I just haven't seen much of what's been really going
4 on behind the scenes.
5 MR. FROST: Would that be a bank in the UK,
6 or --
7 THE WITNESS: You know, the location of the
8 bank, I don't really know where.
9 MR. FROST: I mean, it would be chartered
10 some way, wouldn't it?
11 THE WITNESS: I'd have to get the specifics
12 on that. But from what I understood, it would be our
13 own bank and that we would have our own banking
14 license. And that's what I filled out was an
15 application for the bank license to be in my name, so
16 I'd be the owner of this bank. But I don't know the
17 status of everything on that yet.
18 MR. FROST: Okay.
19 BY MS. OKINAKA:
20 **Q So in your January 12th video, webcast, you**
21 **say that you've received half a billion dollars in**
22 **purchases from members to date. And does that include**
23 **purchases made with account balances, then?**
24 A Right. That's correct. So it's been that
25 amount of sales generated since the beginning.

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1 **Q So have you disclosed to members that this**
2 **is not -- well, this is not all new cash flowing into**
3 **Traffic Monsoon, that some of it is use of account**
4 **balances? Or do you feel it doesn't -- it's a**
5 **distinction without a difference?**
6 A I never really looked at it that way. I
7 always just looked at it as since it is real money
8 being actively used to make a purchase, then it's a
9 sale that's backed up by real money. So it's real.
10 It's a real sale. That's the way I look at it,
11 anyway.
12 MS. OKINAKA: I don't know if we have any
13 more questions for you today, so thank you very much
14 for coming in. And if you want to say anything on
15 the record now to add to what you've said so far,
16 feel free.
17 THE WITNESS: No. I guess -- I guess it's
18 good for me to read over what it was that you guys
19 were investigating for. And I hope that through
20 these conversations that you've been able to discover
21 that I haven't been offering any kind of investment,
22 and it's definitely -- there's nothing misleading on
23 the website as far as what people are purchasing.
24 Everything is fully disclosed, described, outlined.
25 And even if there's a little confusion with

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1 things, like when you lose PayPal, your mind gets
2 scrambled and you're out of sorts, and I might have
3 made mistakes of saying something the wrong way. But
4 I've always been honest and transparent with the
5 people that are involved in my business.
6 MS. OKINAKA: Okay. All right, we're off
7 the record at five after three.
8 (Whereupon, at 3:05 p.m., the examination
9 was concluded.)

* * * * *

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1 PROOFREADER'S CERTIFICATE
2
3 In The Matter of: TRAFFIC MONSOON, LLC
4 Witness: Charles David Scoville
5 File Number: SL-02736-A
6 Date: Tuesday, May 17, 2016
7 Location: Salt Lake City, UT
8

9 This is to certify that I, Maria E.
10 Paulsen, (the undersigned), do hereby swear and
11 affirm that the attached proceedings before the U.S.
12 Securities and Exchange Commission were held
13 according to the record and that this is the
14 original, complete, true and accurate transcript that
15 has been compared to the reporting or recording
16 accomplished at the hearing.

17
18 _____
19 (Proofreader's Name) (Date)
20
21
22
23
24
25

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